

EXHIBIT

5

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF BILLEE STARR AVINGTON

I, Billee Starr Avington, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from January 2010 until September 2010. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Community Home Health (CHH) program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with about \$10,000 in federal student loans that I cannot afford. I also had to pay \$88 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in community home health.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in community home health. This was supposed to include the knowledge I would need to pass the certification exam.

8. They also told me that if I attended and graduated from RSHT, I would be eligible to make a good living. They told me that my certification would allow me to run my own home health care business, and that I would be successful because it was a booming industry. They also told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school helped me complete my financial aid paperwork and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. I learned near the end of the CHH program that there is no such thing as certification in "community home health" in Virginia and that RSHT did not know what certification examination I and the other CHH students would take. After I graduated the school decided that we should take the Patient Care Technician certification exam. The exam tested skills that we did not learn at RSHT, such as skills related to taking blood and EKG tests, and as a result I did not pass.

13. I and many other CHH students were very upset with how RSHT handled the CHH program and the certification issue. We complained, and the school enrolled us in a six-week Certified Nurse Aide Training Program at another school, the Professional Career Institute. It cost RSHT less than \$1000 to enroll me in that program, but RSHT did not refund any of the more than \$10,000 I had paid for the CHH program.

14. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

15. Another problem with RSHT was inadequate classroom space. CCH did not have its own classroom so we would have to share space with the other programs. This created a very difficult learning environment.

16. RSHT also failed to give me an appropriate externship. For my externship, I spent six weeks at a nursing agency called Heaven Sent. Instead of gaining broad experience in home health care, I spent most of my time waiting around or engaging in activities that required no specialized medical training. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

17. Another problem with my externship was that Heaven Sent is located in Colonial Heights, Virginia, which is about a forty-five-minute drive from my home. Completing the externship also required additional driving to the homes of Heaven Sent's clients. The school had not told me that the externship would be so far away and did not reimburse students for gas or mileage. The distance and additional expense of the externship was a big hardship for me.

18. I have tried very hard to get a job as a home health care professional since graduating from RSHT, but I have been unsuccessful.

19. I know very few people from RSHT who have found jobs in their field of study.

20. RSHT's career services office has given me very little help in finding a job. I left numerous messages for the career services office and never received a call back. When I asked for help with my resume, I was told that an RSHT administrator would get back to me, but she never did. When I was finally able speak to someone in the career services office, she told me that because I was no longer in RSHT's system, they couldn't help me.

21. Instead of working in community home health, I clean pools part-time to make ends meet.

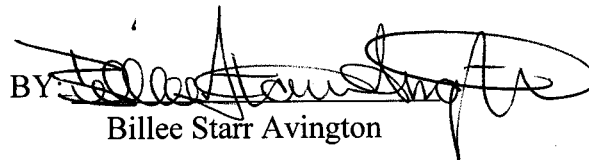
22. I was able to secure a forbearance on my student loans for six months, which is about to expire. I do not know how I am going to make the payments, which are over \$100 per month.

23. I am white, but the vast majority of students at RSHT were African American. I think RSHT intentionally focuses its marketing and recruiting at African-American and/or lower-income people.

24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a

mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: 
Billee Starr Avington

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF VINNETTA BANKS

I, Vinnetta Banks, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from June 2009 until February 2011. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Surgical Technology program at the Richmond campus. I completed the program and will graduate in October 2011.
3. I left RSHT with about \$12,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. I was interested in enrolling in the Radiologic Technology program, but the admissions officer informed me that this program was not available at the Richmond campus. She convinced me to enroll in the Surgical Technology program instead by telling me a number of things about the program that did not turn out to be true.

5. For example, she told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain the necessary clinical experience I needed to become certified as a surgical technician.

6. She also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

7. She also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. She told me that RSHT's career services office would give me extensive assistance in finding a job.

8. She told me that as a surgical technician, I would earn the same amount of money as a radiologic technologist, which was the job I was originally interested in pursuing at RSHT.

9. She also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. I did not want to take out a loan. The school helped me prepare my financial aid paperwork and did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. A central reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. There was a high rate of turnover because teachers would quit or get fired. Because the school could not replace teachers quickly enough, we went for 10 weeks without a teacher. Sometimes an RSHT administrator would try to lead the class, even though he did not have a background in surgical technology.

13. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, I had to take advanced courses in surgical technology before I completed the basic courses. This created a very difficult learning environment.

14. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books and sometimes we didn't receive our textbooks for a class until after the class had already started.

15. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Although I was only supposed to spend 5 of my 15 externship weeks learning instrumentation, RSHT did not find an externship site for me and I ended up spending 10 weeks in "central sterile," where my only task was to sterilize and pack instruments.

17. When RHST told me that I would spend my 5 remaining externship weeks in “central sterile” as well, I refused. Instead, I arranged an externship site on my own at Stoney Point Surgery Center. However, I was not able to complete all of the 150 required procedures in just one 5 week externship. As a result, I cannot be certified as a surgical technician.

18. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Even though certification is not technically required to work as a surgical technician, in practice it is what employers want to see in job applicants.

19. I have not taken the certification exam yet because I know that even if I pass the exam, I still do not have the 150 procedures to get certified. Moreover, many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT’s career services office has given me very little help in finding a job.

22. Instead of working as a surgical technician, I work part-time as a laboratory technician. I was able to get this job after taking a 6-week phlebotomy course. My current employment is not at all related to the education I received at RSHT.

23. I am supposed to start paying back my loan this fall, but I cannot afford to pay it back without a full-time job.

24. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a

mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: 
Vinnetta Banks

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
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Plaintiffs,

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RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF MELISSA BLANEY

I, Melissa Blaney, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2008 until 2010. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.
3. I left RSHT with over \$10,000.00 in federal student loans that I cannot afford. I also had to pay at least \$40.00 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to become a certified surgical technician, including the knowledge I would need to pass a certification examination and the necessary clinical experience. RSHT also told me that the cost of the certification examination would be covered, and I would not have to pay for it out of my own pocket.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn \$40,000 to \$50,000 per year. They told me that RSHT's career services office would give me extensive assistance in finding a job.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. I have not signed up to take the certification exam because I know that I'm not adequately prepared. The

curriculum just did not match up with the certification exam, and I would have to invest considerable time to learn the material necessary for the exam on my own.

12. In addition to feeling that I was not prepared, I also did not have the money to pay for the cost of certification exam. Although RSHT had told me that they would pay for me to take the certification exam, that turned out not to be true.

13. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, at one point in the program, we did not have a teacher for over a week. We were required to come to class, but did nothing. There was not even a substitute teacher.

14. In my computer class, the teacher did not show up for the final exam. After sitting in the classroom for nearly two hours, an instructor from another program came in and informed us that we would all receive "A"s since the teacher was absent. We never took the exam for that class.

15. Additionally, RSHT did not provide us with the in-depth Anatomy and Physiology course that was promised for students in the Surgical Technology program. I received an "A" for this class even though I never had the chance to take it.

16. Textbooks were also a major problem. RSHT did not have enough textbooks for all of the students and for some classes, we never received textbooks.

17. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us, such as gloves, gowns, and medical instruments. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

18. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. While I spent part of my externship in an operating room, I completed the remainder of externship at two dentists' offices which did not count toward the clinical experience I needed for certification. Because RSHT did not arrange a proper externship for me, I did not have the opportunity to complete the required 150 surgical procedures. Therefore, I cannot be certified as a surgical technician.

19. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. I lack experience in the operating room that employers are looking for due to my externship placements at RSHT. I have also been told that RSHT did not have the proper accreditation in the field of surgical technology.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT's career services office has given me no help in finding a job. When I asked for job placement assistance, I received just one email that contained one job posting and nothing further.

22. Instead of working as a surgical technician, I am unemployed. I have stopped looking for a job in the field because I do not feel as though RSHT provided me with the necessary training to work as a surgical technician.

23. I am supposed to make monthly payments on my student loans, but I cannot afford them. I have been able to defer repayment for six months, but I do not know how I am going to make the payments when the deferment is over.

24. I am white. I think RSHT intentionally targets its marketing and recruiting at low-income and/or African-American people.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: 
MELISSA BLANEY

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF CATHRYN CHAMPACO

I, Cathryn Champaco, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2008 until 2009. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Surgical Technology program at the Chester campus. I left the program after about 10 months.
3. I left RSHT with over \$10,000.00 in federal student loans that I cannot afford. I also had to pay \$40.00 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. The school pressured me to enroll in the Surgical Technology program. RSHT also told me a number of other things that did not turn out to be true.

5. For example, I was also told that the Surgical Technology program was the best program at the school.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become a certified surgical technician, including the knowledge I would need to pass a certification examination and the necessary clinical experience.

7. They also told me that near the end of my education at RSHT, the school would arrange externships for me where I would obtain valuable hands-on experience related to my field of study.

8. They also told me that if I attended and graduated from RSHT, I would get a good job as a surgical technician. RSHT told me that the Surgical Technology program was the one in which I would make the most money upon graduating. They told me that I would earn at least \$50,000.00 a year. They also told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, the overall quality of instruction at RSHT was very poor. When we started our classes in Surgical Technology, we did not have an instructor for two weeks. In addition, our classes were supposed to last from 5:00 p.m. until 10:00 p.m. However, I was normally home by 7:00 or 7:30 p.m. Students spent the majority of class time completing crossword puzzles and word searches.

13. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, we didn't have very many medical instruments, and we would have to share these instruments with other students. Additionally, our instructors really did not teach us how to use these instruments.

14. Furthermore, RSHT did not arrange an externship for me as promised. In fact, only two students in my class got externships. RSHT told us that these two individuals got externships because they passed some sort of required test and were qualified while the rest of us were not. However, to my knowledge, such a test was never offered or administered to any of the students in my class, including the two students placed in externships. I was never offered such a test to demonstrate my knowledge before beginning the externship.

15. Additionally, RSHT subjected its students to arbitrarily-enforced rules. For instance, one day the school told us that we were required to wear white tennis shoes even though at the start of the program they told us that the color of our shoes did not matter. The school also told us that coloring our hair was against the school's dress code. RSHT would not let me attend class the following day because I continued to wear a pair of non-white tennis

shoes. RSHT also would not let me attend class because of the blonde highlights in my hair. I could not afford to buy a new pair of white tennis shoes, and did not understand the point of the hair color rule.

16. I became so frustrated with my education at RSHT that I made the decision to quit my program. RSHT told me that if I left the program at that point, I would not have to pay for the second half of the program. However, a few months later, RSHT told me that I had pay over \$2,000 because I left the program early.

17. I don't know anyone from RSHT who has found a job in his or her field of study.

18. Instead of working as a surgical technician, I am unemployed.

19. My student loans are currently in deferment because I am unemployed. When my deferment expires and my loans become due, I am not sure how I will make payments. In addition, I am currently paying \$50.00 per month to a collections agency to cover the \$2,000 that RSHT told me I owed when leaving the program..

20. I am white. The majority of students at RSHT are African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and African-American people.

21. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: 
CATHRYN CHAMPACO

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
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v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF SHARON CHAVIS

I, Sharon Chavis, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2007 until August 2008. The school is known as "Richmond School of Health and Technology."
2. I was enrolled in the Surgical Technology program at the Richmond campus. I did not graduate from the program.
3. I left RSHT with over \$10,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to become a certified surgical technician, including the knowledge I would need to pass a certification examination and the necessary required clinical experience.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and participate in the externship at the same time. RSHT staff assured me that I could do both and told me that the externship would be offered in the evenings.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in the field of surgical technology, and I would earn a high salary. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. RSHT led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

13. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books and sometimes we didn't receive our textbooks for a class until after the class had already started.

14. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. I had to start taking the core Surgical Technology courses before I had completed my general education coursework. This created a very difficult learning environment.

15. RSHT's promise that I could complete the externship in the evenings also turned out not to be true. In the second week of the program, I heard rumors that the externships were only during the day. I brought my concerns to the RSHT administrators and informed them that I wanted to quit if that was the case, but they assured me that the externships could be done during the evenings. Based on this assurance, I decided to remain in the program. In August 2007, however, our class was informed that the externships were only available during the day. At this point, RSHT told me that I could no longer quit because I was already responsible for 100% of the loans.

16. A month before I was supposed to begin my externship, I learned that RSHT had no externship sites – day or night – available for me, and that I would need to leave the program until RSHT could arrange an externship placement.

17. In an effort to graduate on time, I decided to arrange an externship on my own. I contacted hospitals in Virginia, Maryland, and Washington, DC. Johns Hopkins University Hospital in Baltimore, MD agreed to take me on as an extern. I had to take a leave of absence from my day job and relocate to Maryland in order to do the externship, which put an incredible financial strain on my family.

18. I quickly discovered that I didn't have the skills that the staff at Johns Hopkins expected to me have. I didn't have any knowledge of the instruments, needles, or procedures used in the operating room because they were not taught to us at RSHT.

19. Because of the stress of being inadequately prepared for the externship, as well as the financial hardship created by my leave of absence, I no choice but to withdraw from my externship at Johns Hopkins.

20. I returned to RSHT and insisted that the school locate a local facility with evening hours for me to complete my externship. RSHT refused to assist me. As I had no luck arranging an appropriate externship for myself in the Richmond area, I had to leave the program.

21. I also requested that RSHT assist me with job placement. Again, they refused.

22. Instead of working as a surgical technician, I run a child care center.

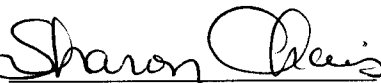
23. I know very few people from RSHT who have found jobs in their field of study.

24. I am scheduled to pay over \$150/month on my student loans, but I cannot afford to pay so much. I was able to defer repayment for a year, but I do not know how I am going to make the payments when the year is over.

25. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

26. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19th, 2011

BY: 
Sharon Chavis

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MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
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RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF WHITLEY CLARK

I, Whitley Clark, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from January 2010 until August 2010. The school is also known as "Richmond School of Health and Technology."

2. I learned about RSHT by seeing ads on TV. The ads said that the school provided job placement services.

3. I was enrolled in the Community Home Health (CHH) program at the Richmond campus.

4. I left RSHT with over \$4,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would make me qualified as a home health aide.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to work in my field of study.

9. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. I would be qualified to work in hospitals and nursing homes, or I could do private-duty nursing.

10. The school helped prepare my financial aid paperwork and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. I learned near the end of the CHH program that there was uncertainty about what certification I was working towards. Nobody at RSHT seemed to know what title CHH students were eligible to receive upon completing the program. I did not learn until near the end of the class that there was a certification exam I would have to sit for after I finished my externship. I had not realized I would have to take an exam to become a certified nursing assistant.

14. Another significant problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. Our program didn't have its own supplies so we would have to go into the surgical technician room to use their materials. We did not have sufficient access to the surgical technician room, however, so we were not able to learn what we were supposed to learn.

15. Another problem with RSHT was inadequate classroom space. Our class was supposed to have its own room, but almost every day we had to move to a different room. Sometimes we would have to go into other parts of the building or into the Annex in the mall.

16. RSHT also failed to give me an appropriate externship. The school placed me at Heaven Sent, a nursing facility in Colonial Heights, Virginia, which is about a half-hour drive outside Richmond, Virginia. I did two weeks at the externship, but then I didn't have a car anymore and I didn't have money for gas. The school said there was nothing they could do because they couldn't find any closer nursing facilities. Because of my transportation difficulties, I was unable to complete the externship, which was required to graduate.

17. After I stopped doing the externship, I first heard about another program requirement that RSHT had never previously mentioned. I learned that after completing my externship I would have an additional 6-week class at a different school called the Professional Career Institute before I could graduate from RSHT.

18. I know very few people from RSHT who have found jobs in their field of study.

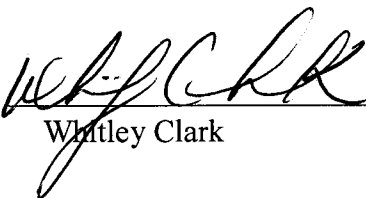
19. Instead of working in home health care, I am unemployed.

20. My loans have entered repayment, but I cannot afford to pay them back.

21. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at people who qualify for grants and loans. Most of the students in my program were African-American.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: 
Whitley Clark

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JESSICA DAVIS

I, Jessica Davis, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2010. I graduated from RSHT with honors. The school is also known as “Richmond School of Health and Technology.”
2. I learned about RSHT through advertisements in an African-American owned newspaper.
3. I was enrolled in the Medical Assistant program at the Richmond campus. I completed and graduated from the program.

4. I left RSHT with over ten thousand dollars in federal student loans that I cannot afford. I also had to pay \$ 40.00 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would give me everything I needed to work as a medical assistant. They also told me that if I attended and graduated from RSHT, it would be easy for me to get a job as a medical assistant.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. The school filled out a lot my financial aid paperwork for me and told me to sign the forms.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 8 above.

10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. One big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, I almost went through an entire module without having a teacher. Teachers were constantly leaving the program. During these times, a school administrator would come in and, instead of teaching us, would just tell us to read a chapter in a textbook.

12. An additional way in which my education at RSHT was disrupted was that financial aid officers would regularly enter class to get people to sign their loan paperwork.

13. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. Students even wrote letters to RSHT administrators about the shortage of supplies. While the administration acknowledged the problem and promised to get us the necessary supplies, the situation remained largely unchanged.

14. Another problem was that when I did my externship, I didn't have skills that they expected to me know. I didn't have these skills because the skills were not taught to us at RSHT. The people who were employed at my externship site did not believe that RSHT students had the necessary training to do work in the field.

15. I have tried to get a job as a Medical Assistant since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

16. I have not taken the certification exam because I do not think being certified will help me much in finding a job as a medical assistant due to RSHT's poor reputation.

17. I know very few people from RSHT who have found jobs in their field of study.

18. RSHT's career services office has given me very little help in finding a job. During the period around graduation, the only assistance the school provided was to e-mail me about one job. However, it was a job that I already knew about and for which I had already applied. The only other contact I've had with the school regarding employment is a card asking me if I had yet found a job.

19. Instead of working as a Medical Assistant, I work part-time at a deli.

20. I am supposed to pay over \$100/month on my student loans. My loans are now in forbearance because I cannot afford to pay so much. I do not think I will be able to afford these payments when the forbearance expires in a few months.

21. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and African-American people. I believe that marketing RSHT as a school "on the bus line" is an attempt to appeal to minority populations. A lot of people who attended RSHT used public transportation and lived in public housing.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Even though I graduated from the program with honors, just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: Jessica Davis
JESSICA DAVIS

Case 3:12-cv-00373-JAG Document 78-5 Filed 04/09/13 Page 34 of 427 PageID# 2203

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF ERWIN DAWKINS, SR.

I, Erwin Dawkins, Sr., hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I became a student at RSHT in June 2009 and finished the program in December 2010. The school is also known as “Richmond School of Health and Technology.”
2. I enrolled in the Surgical Technology program at the Richmond campus.
3. I left RSHT with over \$12,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. I was initially interested in the Radiologic Technology

program, but the admissions officer informed me that this program was only available at the Chester campus. I indicated that I would be willing to go to the Chester campus, but the admissions officer advised me to consider the Surgical Technology program instead. They told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that if I attended and graduated from RSHT, I would get a good job as a surgical technician. They told me that students find jobs within one to two months of graduating. They led me to believe that RSHT's career services office would give me extensive assistance in finding a job, from offering one-on-one counseling to setting up job interviews.

7. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

8. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and participate in the externship. RSHT staff assured me that I could do both and told me that the externship would be offered in the evenings.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

12. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. At times, new teachers would come and go every few days.

13. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. Students from all levels were grouped into the same classes. This created a very difficult learning environment.

14. Textbooks were also a major problem. Books were included in tuition, but I did not receive my textbook until three months into the program. Some of my classmates did not receive their textbooks until even later. The only reason that I received my textbook when I did was because I complained to the administration almost every day about the lack of textbooks.

15. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. Because the school did not provide us with medical instruments, I drew and photocopied pictures of the instruments for the other students in my class.

16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for

150 procedures. Instead, RSHT sent me to "central sterile," where I only learned to sterilize and pack instruments. I ended up spending all 15 weeks in central sterile even though RSHT administrators continued to promise me an externship in the operating room that would count towards certification. At the time I graduated, I had not completed any of the 150 required procedures.

17. After I graduated and passed the certification exam, I continued to complain to RSHT that I could not get certified because they had not provided the required externships in the operating room. I had to complain to the RSHT administration for almost 6 months before the school finally set up an additional 5-week externship for me in an operating room in May 2011.

18. RSHT's promise that I could complete the externship in the evenings also turned out not to be true. The externship in the operating room that RSHT finally offered me was during the day at Southside Regional Medical Center in Petersburg, which is about 40 miles away. I have had to take a leave of absence from work in order to be able to participate in the externship. I am not sure if my employer will allow me to return to work once I complete my externship.

19. My externship will end in early August 2011, and it is highly unlikely that I will satisfy the 150 case requirement. I have tried to get additional time in the operating room on my own, but health care facilities won't take me because they say that the school is supposed to set up the externship.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT's career services office has given me very little help in finding a job. All the career services office does is post job listings on a bulletin board.

22. Instead of working as a surgical technician, I work as a custodian at Virginia Commonwealth University. This is the same job that I had before I attended RSHT.

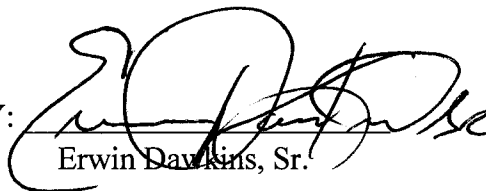
23. I am supposed to pay about \$80 per month on my student loans, but I cannot afford to pay so much. I do not know how I am going to make the payments when they become due in September 2011.

24. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY:



Erwin Dawkins, Sr.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF ERIN DELP

I, Erin Delp, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from August 2008 until September 2008. I was enrolled under my maiden name, Erin Kavanaugh. The school is also known as "Richmond School of Health and Technology."

2. I learned about RSHT by searching for Licensed Practical Nursing (LPN) programs online. The website said RSHT helped its graduates with job placement and that a high percentage of its graduates were employed.

3. I was enrolled in the Licensed Practical Nursing program at the Richmond campus.

4. I left RSHT with about \$3,000 in debt that I cannot afford. I also had to pay \$30 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass the state boards.

7. They also told me that the school would arrange clinicals for me where I would obtain valuable experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become licensed by Virginia in my field of study. This was supposed to include the knowledge I would need to pass the state exam and the necessary clinical experience.

9. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. The school told me that they would take care of my financial aid for me. They talked to me about taking out loans, but did not tell me how much the loans would be. I did not fill out or sign any loan forms. The school did not clearly explain to me what financial obligations I would have to incur to attend RSHT.

11. When I met with RSHT employees before I decided to attend, I had already taken some classes at community college. RSHT staff assured me that those credits would transfer so I would not have to repeat the same classes at RSHT.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. For example, a major problem with RSHT was the poor quality of instruction. Material was not presented in a way that could be easily understood by someone who had never seen it before. Information I was given often seemed incomplete or lacking in substance.

15. Textbooks were also a problem. Books were included in tuition, but the school gave us books containing material that did not seem up to date. When I compared the books I received from RSHT to the ones I used for my community college classes, I saw that the community college books went into far greater depth about the topics we covered.

16. RSHT's promise that my community college credits would transfer to RSHT and that I would not have to retake classes also turned out not to be true. After I had enrolled, the school told me that I would have to attend the classes that I had already taken at community college, but I could audit the classes without paying. However, when I received a bill from RSHT, it included classes that were supposed to be transfer credits.

17. As a result of the poor education I was receiving at RSHT, I chose to leave the program after only one month. I had wanted to leave sooner, but RSHT staff pressured me to stay.

18. After I left RSHT, the school sent me a bill for \$12,000. Through the process of disputing this bill, I obtained paperwork from RSHT that indicated RSHT had taken out federal loans in my name that they returned to the government upon my withdrawal from the program.

19. Instead of working as an LPN, I work for a youth services organization. I was able to obtain my job after completing a social work degree at Virginia Commonwealth University.

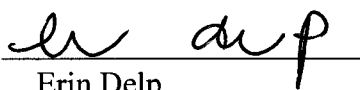
20. RSHT sued me over my bill and I have now been required by a court to pay RHST about \$3,000.

21. I am white. The vast majority of my program was African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income people.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18 2011

BY:


Erin Delp

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF RAVONNE DOUGLASS

I, Ravonne Douglass, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2007 until 2009. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.
3. I left RSHT with federal student loans equal to nearly \$20,000. I also had to pay approximately \$100.00 out of my own pocket to RSHT each month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to become certified as a surgical technician.

6. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in surgical technology and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

7. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

8. RSHT personnel told me that I would receive an Associate's Degree upon completion of the program and that the Associate's Degree and credits would transfer to another educational institution.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. For example, RSHT did not prepare me for a certification exam that would help me get a job as a surgical technician. After I enrolled, I discovered that the certification RSHT prepared us for, which is given by the National Center for Competency Testing ("NCCT"), is not recognized by most employers. Employers instead generally recognize a different organization's

certification for surgical technicians, but RSHT students cannot take the other organization's certification examination.

12. As a result of this information, I chose not to take the certification exam offered by the NCCT for which RSHT was supposedly preparing me. I do not see the point in taking the exam for a certification that will do little to help me find a job as a surgical technician. I also did not take the test because I did not feel adequately prepared for it after completing RSHT's curriculum.

13. Another major problem with RSHT was that often we didn't have a teacher. For example, I did not have a teacher for several weeks at one point in the program. During that time, we did not receive any sort of instruction and were left to study on our own.

14. During this period without a permanent instructor, the school sent part-time instructors to teach us who were not there consistently and would often miss classes.

15. When there was a teacher, some of the instructors did not have experience in surgical technology. For example, one of my teachers had a radiology background and did not have the required knowledge to teach the class. That teacher mostly just sat in front of the classroom and did not try to teach us.

16. Whenever students would go to the administration with concerns—such as not having instructors—an administrator would simply tell the students that RSHT was working to address the problem. However, these problems were never addressed.

17. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, our instructors would give us packs of gloves and tell us to fold the gloves back in the wrapper so

they could be re-used. This took away from the experience of preparing for the operating room since gloves are never re-used in practice. Additionally, we only had one set of instruments, and the set was an incomplete mix of new and old instruments.

18. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

19. I know very few people from RSHT who have found jobs in their field of study.

20. RSHT's career services office has done nothing to help me find a job as a surgical technician.

21. Instead of working as a surgical technician, I work at Goodwill.

22. Given my poor career prospects with an RSHT degree, I considered pursuing a four-year nursing degree at another school. I thought I would be able to transfer my Associates Degree and its credits to the four year institution, as RSHT had promised. However, I have learned that other schools do not recognize credits from RSHT.

23. I am supposed to make a monthly payment of over \$100 on my student loans, but I cannot afford to pay so much since I am only working part-time. Currently, my loans are in forbearance but I do not know how I will pay them when the forbearance period is over. The forbearance period is only six months.

24. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African American people.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a

mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: 
RAVONNE DOUGLASS

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF SUZANNE FERRELL

I, Suzanne Ferrell, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2010. The school is also known as “Richmond School of Health and Technology.”

2. I learned about RSHT from an African-American friend who was thinking about attending RSHT.

3. I was enrolled in the Pharmacy Technician program at the Richmond campus. I completed and graduated from the program.

4. I left RSHT with thousands of dollars in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study and allow me to practice as a pharmacy technician in Virginia.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become licensed in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

9. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have a good chance of obtaining one.

10. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. Before I enrolled at RSHT, I informed the school that I had a prior drug conviction and I asked I could still be in the program and find work in the field afterwards. The RSHT employee I met with assured me that I could still work in the field and that my criminal record would not be a problem.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. A big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, one of my teachers left and it took almost a month for RSHT to get a replacement. In the meantime, school administrators would come into the class and give us busywork. The work included crossword puzzles and other assignments that had no relation to pharmacy technology.

15. Another big problem with RSHT was the poor quality of instruction. For example, one of my teachers had very little knowledge or experience. I had to teach myself the material because I wasn't learning in class.

16. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books. My textbooks had many grammatical mistakes and my teacher complained that much of the medical information in my books was years out of date. Pharmaceutical information and drug names change frequently so it was a serious disadvantage for me to be studying materials that were not current.

17. Another significant problem with RSHT was that the school did not have enough equipment and supplies, including pharmacy tools, for our instructors to use to teach us. There was little equipment beyond empty pill bottles. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

18. Another problem with RSHT was that I didn't have most of the skills that the staff at the drugstore expected me to know when I did my externship. I didn't feel prepared for my

externship and my externship supervisor told me that there were things that I didn't know that I should have learned. I didn't have these skills because the skills were not taught to us at RSHT.

19. Another problem with RSHT is that many externship placement sites do not want RSHT students because they know that RSHT does such a poor job of educating and training its students. I originally wanted to extern at a hospital, but I learned that the hospital's pharmacy had stopped accepting RSHT students as externs because the hospital had bad experiences in the past with RSHT students who were not properly prepared.

20. Towards the end of the program, I learned that I would not be able to get the certification that RSHT had promised. Throughout the program, I had continued to approach RSHT with questions about my certification, and RSHT repeatedly assured me that my past drug conviction would not bar me from becoming certified. RSHT continued to assure me of this up until I graduated. The information RSHT told me was not true and I cannot obtain a license to work as a pharmacy technician in Virginia. My time at RSHT turned out to be worthless because I cannot be licensed to work in the field.

21. I know very few people from RSHT who have found jobs in their field of study.

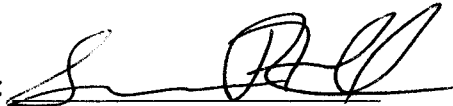
22. Instead of working as a pharmacy technician, I am unemployed. I intend to return to school soon to study automotive technology a different school.

23. I was supposed to begin paying about \$50/month on my student loans last summer but I could not afford to pay so much. The only reason I have not defaulted is that I was able to get temporary forbearance on my loans.

24. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and African-American people.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: 
Suzanne Ferrell

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become certified as a surgical technician. This was supposed to include the knowledge I would need to pass the certification exam.

7. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that over 50% of students get a job offer from their externship site. They told me that the starting salary for a surgical technician is about \$40,000 a year. They told me that RSHT's career services office would give me extensive assistance in finding a job.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that the classes and externships I would need to take were offered in the evenings.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. The classes at RSHT were difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. On several occasions I had to take a more advanced course before I had taken the introductory course. This created a very difficult learning environment.

13. Another major problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies, including medical instruments used by surgical technicians.

14. Getting a proper externship was a crucial part of what my education at RSHT was supposed to provide because certification as a surgical technician requires participation in 150 surgical procedures. I spent 5 weeks of my externship in "central sterile," sterilizing and packing instruments, but this experience did not assist me in obtaining the 150 procedures needed for certification. RSHT did not have any externships in the operating room available after I finished at central sterile, so I left the program, hoping that I would return when appropriate externships became available. I called RSHT regularly to check whether they had found an operating room externship site for me. After 5 months, I gave up. Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified.

15. RSHT's promise that the externship would not conflict with my day job also turned out not to be true. I had to take time off from work in order to be able to participate in the externship, which RSHT later told me was only available during the day.

16. I have looked for jobs as a surgical technician, but I have been discouraged from applying because I don't have any hands-on experience. Moreover, many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

17. I know very few people from RSHT who have found jobs in their field of study.

18. RSHT's career services office has given me very little help in finding a job.

19. Instead of working as a surgical technician, I work as a legal assistant for an attorney.

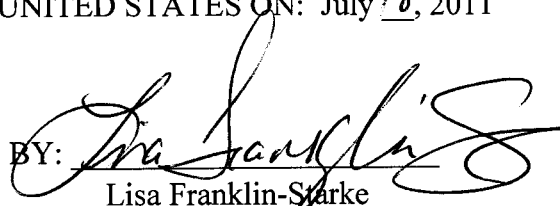
20. I am supposed to pay more than \$100 per month on my student loans from RSHT, but I cannot afford to pay so much. I was able to defer repayment for a year, but I do not know how I am going to make the payments when the year is over.

21. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY:

A handwritten signature in black ink, appearing to read "Lisa Franklin-Starke", written over a horizontal line.

Lisa Franklin-Starke

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JOYCE FREEMAN

I, Joyce Freeman, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a current student at RSHT. The school is also known as "Richmond School of Health and Technology." I enrolled in the school in 2009. I have completed my coursework, and am currently waiting to complete the final portion of my program's externship component.

2. I learned about RSHT from a friend who is African-American.

3. I am enrolled in the Surgical Technology program at the Richmond campus.

4. I will leave RSHT with about \$20,000.00 in federal student loans that I cannot afford. I also had to pay \$40.00 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that have not turned out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. Additionally, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to surgical technology.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the necessary externship experience and the knowledge I would need to pass the certification exam .

9. Furthermore, they told me that if I attended and graduated from RSHT, I would get a good job as a surgical technician. They told me that I would earn around \$30,000 to \$35,000 a year. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. One reason that we didn't learn what we needed to learn at RSHT was that the school fired two of our teachers during the course of the program, even though one of the teachers was a particularly good instructor. The change in teachers created a disruptive learning environment.

14. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, the lab often did not have gloves or surgical gowns.

15. Getting a proper externship was a crucial part of what my education at RSHT was supposed to provide because certification as a surgical technician requires being on a surgical team for 150 procedures. Instead, I spent ten weeks of my externship in "central sterile," where I only sterilized and packed instruments. Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified. I have been waiting for about a year for RSHT to find me a five-week final externship assignment so I can graduate. Even if I get a good externship and graduate, however, I will not have the 150 procedures needed for certification because five weeks is not enough time to get that many procedures.

16. Many of my classmates chose to complete all of their externships in central sterile so that they could simply fulfill the graduation requirement. However, the time they spent in central sterile does not apply toward the 150 procedures needed for certification.

17. Because RSHT advised me to wait until I completed my externship to take my certification exam, I have delayed taking my exam for nearly a year. As a result, I do not feel prepared to take my certification exam since it has been so long since I have studied a lot of the material.

18. I know very few people from RSHT who have found jobs in their field of study.

19. Currently, I am working part-time as a Certified Nursing Assistant at a retirement home. I had my CNA license and this job before beginning the Surgical Technology program at RSHT.

20. RSHT knew I had my CNA license when I met with the admissions office and the school encouraged me to enroll in the Surgical Technology program. The school told me that I would be able to earn more money by attending RSHT and getting a surgical technician certification than I could as a CNA.

21. I am supposed to make a monthly payment of over \$150 on my student loans, but I cannot afford to pay so much since I am only working part-time. Currently, my loans are in forbearance but I do not know how I will pay them when the forbearance period is over. The forbearance period is only six months.

22. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY:


JOYCE FREEMAN

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF LOLITA GRANT

I, Lolita Grant, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from March 2010 until October 2010. The school is also known as "Richmond School of Health and Technology."
2. I learned about RSHT from seeing TV advertisements. The ads said that once you graduated, the school would find you a job at a good pay rate.
3. I was enrolled in the Community Home Health (CHH) program at the Richmond campus. I completed the coursework for the program, but have not graduated because I have been unable to complete the externship requirement.

4. I left RSHT with at least \$4,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

9. RSHT employees also told me that I would receive a diploma for nursing upon completing the program.

10. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. I asked if it was a guarantee that I would find employment and they told me yes. They told me after I graduated, I would earn \$16-18/hr and could work anywhere I wanted. They also told me that upon graduation, RSHT's career services office would place me in a job.

11. The school helped me fill out my financial aid paperwork and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. I learned near the end of the CHH program that there is no such thing as certification in "community home health" in Virginia and that RSHT did not know what certification examination I and the other CHH students would take.

15. I and many other CHH students were very upset with how RSHT handled the CHH program and the certification issue. We complained, but we received no response while I was still attending the program. In early 2011, I got a call from RSHT telling me that I could take a Certified Nursing Assistant (CNA) class at another school. I have not enrolled because RSHT told me I would need to pay a \$75 readmission fee to join the class, which I do not have. In addition, unlike the RSHT campus, the CNA class is not accessible via public transportation.

16. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of hands-on skills at RSHT because of the lack of equipment and supplies.

17. RSHT also failed to arrange an externship for me as promised. When I was ready to start an externship, the school only had placements in far-away areas like Hopewell, Petersburg, and Colonial Heights, Virginia. Because I and several of my classmates did not have transportation to get to those places, RSHT told us we would have to sit out until the next externship cycle came around and they would call us when they had a placement available.

18. RSHT called me with an externship placement about half a year later, but the placement immediately fell through because my classmates and I lacked the skills and

experience that RSHT had told the externship site we possessed. RSHT sent us to a nursing facility called Comfort Keepers. However, the woman who was in charge of the facility cancelled our externship when she realized that we did not have any experience in the field. As a result, I was not able to complete the externship requirement.

19. I know very few people from RSHT who have found jobs in their field of study.

20. Instead of working in community home health, I am unemployed. Everywhere I have sought employment, no one recognizes the education that I received in community home health.

21. My loans have entered repayment, but I cannot afford to pay them back.

22. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income people, especially those people "on the bus line." The majority of students in my program were African-American.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 12, 2011

BY: Lolita Grant
Lolita Grant

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF LATRICE GREELY

I, Latrice Greely, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from September 2008 until September 2010. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Surgical Technology program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with more than \$20,000 in federal student loans that I cannot afford. I also had to pay \$139 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would easily obtain one in a surgical center, outpatient center, or hospital. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

13. Another major reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, one of my teachers did not show up for two weeks straight. During that time, the class would sit for an hour waiting for the teacher, sign the attendance roll, and then go home.

14. Another problem with RSHT was the poor quality of instruction. Teachers were often unknowledgeable and inexperienced. For example, one of my teachers was not able to pronounce many of the medical terms he was supposed to be teaching us.

15. RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us, including medical instruments. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Although the externship was supposed to provide us with operating room experience, I agreed to spend my first 5 week externship in "central sterile" sterilizing and packing instruments because RSHT did not have any operating room placements. I also thought it would give me an opportunity to gain familiarity with the medical instruments that are used in the field but that RSHT did not provide.

17. When RSHT told me that I would have to spend my second 5 week externship also in central sterile, I took time off from the program to try to find my own externship. I was not successful in securing my own externship due to RSHT's poor reputation and the fact that other schools had already established externship programs with the hospitals and surgical centers in the Richmond area.

18. Because I was unable to secure an externship in the operating room, I went back to RSHT and reluctantly agreed to do my second externship in central sterile. During that time I continued to look for an externship myself that would provide the operating room experience I needed for certification.

19. My final 5 week externship was at an oral surgeon's office, but none of the procedures I assisted with counted toward my required 150 procedures. I was forced to quit my job at UPS to attend the externship because the placement was from 9 a.m. to 5 p.m. four days a week.

20. Because I continued to complain to RSHT about the fact that my externships did not provide me with any of the 150 procedures required for certification, RSHT arranged an additional two-week placement at a plastic surgeon's office. However, because of the surgeon's schedule, I only assisted with one surgery over the two-week period that counted towards my 150 procedures.

21. Because RSHT did not arrange a proper externship for me, I only completed one out of the required 150 procedures and cannot be certified. I have tried to get an externship on my own since graduating so that I can get the required experience, but health care facilities won't take me because I am no longer covered by insurance as a student.

22. Another problem with my externship experience was that I didn't have most of the skills that the staff at my externships expected to me know. I didn't have these skills because they were not taught to us at RSHT.

23. I have tried to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful because I do not have enough the experience that employers are looking for. Although I passed the written exam required for certification, I cannot become a certified surgical technician because I do not have the 150 required cases. I lack the right qualifications to find a job in the field because RSHT did not deliver on its promises to me.

24. I know very few people from RSHT who have found jobs in their field of study.

25. RSHT's career services office has given me very little help in finding a job. The career services office told me to go online and apply for jobs, but offered me no individual help.

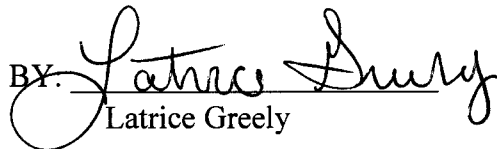
26. Instead of working as a surgical technician, I work at Chippenham Hospital in central sterile, a job which does not require any education in surgical technology.

27. I was able to put my student loans in forbearance, but I do not know how I am going to afford payments in the future. My payments are supposed to be about \$200/month.

28. I am African-American. The vast majority of my program at RSHT was African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

29. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY. 
Latrice Greely

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF DELORES HARGROVE

I, Delores Hargrove, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from February 2007 until October 2007. The school is also known as "Richmond School of Health and Technology."
2. I learned about RSHT from a friend who is African-American and was attending another program at RSHT.
3. I was enrolled in the Medical Billing and Coding program at the Richmond campus. I left the school about halfway through the program.

4. I left RSHT with about \$10,000.00 in federal student loans that I cannot afford. I also had to pay \$40.00 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would give me everything I needed to enter the medical billing and coding profession, including the knowledge I would need to pass the certification exam in the field.

7. They also told me that as part of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in the field of medical billing and coding, and that I would earn a high salary. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school completed my financial aid paperwork and told me to sign the forms. The school did not clearly explain to me what my financial aid forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 8 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. A major reason that we didn't learn what we needed to learn at RSHT was the quality of teachers and instruction. The instructors RSHT provided often had no background in

the subjects they taught. For example, our Anatomy and Physiology teacher was an undergraduate student from a nearby college. The instructor did not know anything about human anatomy; in fact, the instructor's undergrad major was not even related to anatomy. Additionally, our Medical Billing and Coding teacher quit during the program and was replaced by an instructor who was not knowledgeable in the field. Our classes were always rushed and did not provide students adequate time to process the material.

13. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, when I began the program, I started in the middle of the medical terminology course with students who had already been studying the material for a number of weeks. This created a very difficult learning environment.

14. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out-of-date books.

15. When I tried to complain about the quality of the education I was receiving, RSHT administrators would tell me that someone would get back to me. No one ever did. Eventually I was so frustrated with my experience at RSHT that I decided to leave the school about halfway through the program. I did not see the point in continuing with a worthless education.

16. I know very few people from RSHT who have found jobs in their field of study.

17. Instead of working in Medical Billing and Coding, I work at a bakery.

18. RSHT told me that even though I left the school halfway through the program, I was still responsible for the full cost of the program. RSHT also told me that if I left the program, I would not be able to obtain student loans at another school.

19. I am paying over \$50.00/month on my student loans. I struggle to pay this amount every month given my current employment.

20. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

21. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19 2011

BY: 
DELORES HARGROVE

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JASMINE HAWKINS

I, Jasmine Hawkins, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from June 2009 until August 2010. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Medical Assistant program at the Richmond campus. I did not complete the program.
3. I left RSHT with about \$5,000 in federal student loans that I cannot afford. I also had to pay \$ 40.00 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. I felt pressured to sign up for the Medical Assistant program. They also told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. RSHT told me that they would accommodate my schedule when I was placed at an externship. I had a full-time day job and was very concerned about being able to keep my job and participate in the externship. RSHT staff assured me that I could do both and told me that the externship would be offered in the evenings.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become a certified medical assistant. This was supposed to include the knowledge I would need to pass the certification exam.

8. RSHT told me that if I attended and graduated from RSHT, I would get a good job as a medical assistant. RSHT told me that I would probably get hired at my externship. If I did not get hired at my externship, they told me that RSHT's career services office would give me assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. A major reason that we didn't learn what we needed to learn at RSHT was the inconsistency in teaching. At one point we did not have a teacher for one and one-half months. During this time, an RSHT administrator would come and distribute tests or send us home. My class then went through a series of teachers. This constant changing of instructors was extremely disruptive.

13. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. We were constantly skipping around in our textbook in an attempt to accommodate students at different levels. This learning process was very frustrating.

14. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

15. In addition, the school refused to work with me to try and arrange an externship at night that would accommodate my work schedule during the day. RSHT told me that they could not find me an evening externship. As a result, I was forced to arrange an externship myself and had to take time off from RSHT to set it up.

16. After a month or two of searching, I found an externship at medical center. I went back to RSHT so that they could do the paperwork to formalize the placement, but no one at RSHT ever followed up.

17. Again, I was forced to leave the program and wait for an appropriate externship to be arranged. RSHT told me to quit my day job to complete the requirement and graduate. I was

not able to quit my job for the entire 10-week externship, so I had no choice but to drop out of the program.

18. I know very few people from RSHT who have found jobs in their field of study.

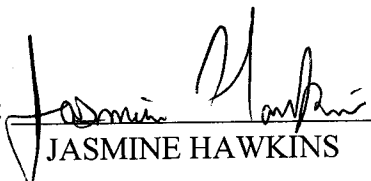
19. Instead of working as a medical assistant, I work in a nursing home delivering meals to residents. This job does not require any specialized training and it is not at all related to the education I was supposed to receive at RSHT.

20. I was able to defer repaying my student loans until next March, but I do not know how I am going to make the payments after that.

21. I am multi-racial (white, African-American, Korean, and Native American). The RSHT student body is majority African-American. I think RSHT intentionally targets its marketing and recruiting at low income and/or African American people.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19 2011

BY: 
JASMINE HAWKINS

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF MARY HITE

I, Mary Hite, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until January 2011. The school is also known as “Richmond School of Health and Technology.”
2. I was enrolled in the Licensed Practical Nursing (“LPN”) program at the Richmond campus. I completed and graduated from the program.
3. I left RSHT with over \$20,000.00 in federal student loans that I cannot afford. I also had to pay money out of my own pocket to RSHT every month. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain

to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become certified and licensed by Virginia as an LPN. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience. This also included paying for our first state board exam.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would provide job placement upon graduation.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. I still do not fully understand the terms of my loans. Each time I have subsequently asked RSHT about my financial obligations, I come away even more confused.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. I did not pass the exam. I believe that the biggest reason that I did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

12. I retok the exam and passed. The only reason I was able to pass the second time was that I studied a lot of material that was not part of our curriculum at RSHT.

13. RSHT did not pay for either of the certification exams that I took.

14. Another significant reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. In one of my classes that met four times a week, the teacher only came one day a week. For the other day, RSHT told me to sign an attendance sheet and leave.

15. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. Our labs did not have the materials we needed to learn.

16. The quality of instruction was also very poor. Our teachers frequently refused to cover certain concepts. They said that we should learn that that material in another class, or that we should have learned it in a prior class.

17. RSHT also failed to give me an appropriate externship. Instead of learning firsthand how to be a practical nurse, I spent most of my time standing around. My externship was not a valuable experience and was not at all like what RSHT told me it would be like. I think that the externship sites felt that RSHT students were not prepared to work with patients, and therefore did not want to put their patients at risk.

18. I have tried very hard to get a job as a nurse since graduating from RSHT, but I have been unsuccessful. I believe that many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. I am currently unemployed.

19. RSHT's career services office has given me very little help in finding a job. The career services called me last month to offer assistance after this lawsuit was filed. I had not had any contact with the school since February.

20. I was so frustrated by my experience at RSHT that I called the Better Business Bureau to complain.

21. I was supposed to start repaying my loans by making a monthly payment, but I cannot afford to do so. I was able to defer repayment for a few months, but I do not know how I am going to make the payments when the deferment period is.

22. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income people like myself.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: Mary Hite
MARY HITE

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF MARCUS HOLLOWAY

I, Marcus Holloway, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a current student at RSHT. I began classes in February 2011 and am scheduled to graduate in October 2011. The school is also known as "Richmond School of Health and Technology."
2. I am enrolled in the Massage Therapy program at the Richmond campus.
3. I will leave RSHT with several thousands of dollars in federal student loans that I cannot afford. I also have had to pay \$40 out of my own pocket to RSHT every month.

4. I met with an RSHT admissions officer before I enrolled at RSHT and started classes. I was interested in enrolling in the Radiologic Technology program, but the admissions officer pressured me to enroll in the Massage Therapy program instead. I told the admissions officer that I needed some time to think it over, and left the RSHT office. The admissions officer then called me every few days, about 5 or 6 times in total, and I eventually made an appointment to learn more about the Massage Therapy program.

5. When I returned to RSHT, I met with admissions and financial aid employees. They told me a number of things about the Massage Therapy program that did not turn out to be true.

6. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become licensed by Virginia in my field of study. This was supposed to include the knowledge I would need to pass the state licensing exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. They also led me to believe that the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. I did

not know I had taken out a loan, and only found out when I received a letter from Direct Loans in the mail after I had enrolled.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 9 above.

11. The education I have received from RSHT has not even come close to living up to RSHT's promises or my expectations.

12. One significant problem with RSHT is that the school does not have enough supplies for our instructors to use to teach us. We waited for months before finally getting supplies we needed, such as towels, lotions, oils, and clean linens. These supplies were not provided by RSHT in any adequate amounts before this lawsuit was filed. We lost valuable class time because of the lack of equipment and supplies.

13. I have not begun the externship portion of the program yet, but I am worried that I will not actually get hands-on experience in the field. Some students have had to complete their externships within the school because RSHT does not allow all of the students in the Massage Therapy program to do their externships off-site.

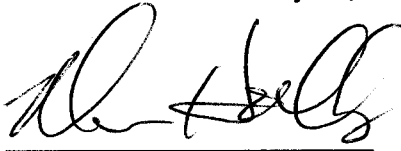
14. I have not yet received any assistance from the career services office to find a job after graduation. I don't know of any students who have received job placement help from RSHT.

15. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

16. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a

mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: 

Marcus Holloway

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF ELISHA JONES

I, Elisha Jones, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2011. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.
3. I left RSHT with well over \$10,000.00 in federal student loans that I cannot afford.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn between \$17.00 to \$18.00/hour as a starting wage. They told me that RSHT's career services office would give me extensive assistance in finding a job.

8. RSHT also led me to believe that most of the cost of attending would be covered by grants, not loans, so that I would not have to repay most of the money. RSHT staff filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. RSHT also told me that that credits I earned while at RSHT would transfer to other institutions and could be applied towards a Registered Nursing ("RN") degree.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT has not prepared me for the certification exam. I have not taken the certification exam yet, but I have reviewed exam preparation materials and found that many of the questions are not related to areas we studied in my classes.

13. I have also learned that the certification exam that RSHT arranges for us to take, which is given by the National Center for Competency Testing ("NCCT"), is not recognized by most employers. Employers instead generally recognize a different organization's certification for surgical technicians, but RSHT students cannot take the other organization's certification examination.

14. Another problem with RSHT is that our teachers changed all the time. This includes teachers changing in the middle of a class. In one class, the replacement teacher spent much of our class time playing computer games and not making any effort to teach the class.

15. Additionally, the quality of instruction was poor. For example, with one of my instructors, class time would often consist of students completing worksheets. There would often be no teaching.

16. Textbooks were also a major problem. RSHT did not provide the students with enough textbooks, leaving people to study from photocopies.

17. Another problem at RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, our lab did not have an operating room setting; instead, it mostly consisted of a bed. At times, we also did not have basic supplies such as gloves or gowns.

18. Additionally, in one of my externships that lasted five weeks, I did not gain much valuable experience. I spent the whole externship in "central sterile" instead of in the operating room.

19. Furthermore, RSHT's initial salary figures for surgical technicians were much higher than the salaries I have found in the field. Instead of \$17.00 or \$18.00/hour, most surgical technicians that I know have started at around \$12.00/hour.

20. Additionally, I have discovered that my RSHT credits cannot be applied towards the completion of an RN degree at another school.

21. Currently, I am working at Southside Regional Medical Center, the site of one of my externships, but the job is in central sterile and I earn \$8 per hour.

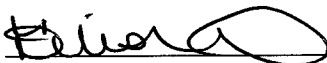
22. Even though I have found employment, many of my classmates were not as fortunate. I know very few people from RSHT who have found jobs in their field of study.

23. I do not know how much my monthly student loan payments will be, but I do not expect to be able to afford them. I am supposed to start repaying my loans in a few months.

24. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people like myself.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: 
ELISHA JONES

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study upon graduation. An admissions officer told me that I would earn at least \$13.00/hour and that RSHT's career services office would give me extensive assistance in finding a job. Additionally, they said that RSHT had relationships with clinics that would provide jobs to RSHT students.

7. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

8. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

9. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

10. For example, RSHT did not prepare me for the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

11. Another reason that we didn't learn what we needed to learn at RSHT was that we went through several teachers during the course of a month before we received a permanent teacher.

12. RSHT also failed to give me an appropriate externship. I did my externship at Primary Health Group in Richmond. Instead of learning firsthand how to be a Medical Assistant and to perform tasks like suturing and giving shots, I spent most of my time filing records and taking blood pressures. My externship was not a valuable experience and was not at all the hands-on experience RSHT told me it would be.

13. I have tried very hard to get a job as a Medical Assistant since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. Employers would tell me that RSHT students were unprofessional. This bad reputation, combined with my lack of experience in the field, has prevented me from getting a job despite having passed the certification exam.

14. I know very few people from RSHT who have found jobs in their field of study.

15. The year after graduation, I contacted RSHT for assistance in finding a job. An RSHT administrator told me that the school would get me a placement with a specific company. However, I never heard anything else about this placement. I called trying to follow up, but those calls were never returned.

16. I briefly did some temp work as a medical assistant, making \$8.00/hour. However, I could never secure a full-time position. Since I could not find work, I let my certification expire.

17. I am supposed to pay over \$100.00/month on my student loans, but I cannot afford to pay so much. Even though I received an initial forbearance, I have since had to default on my loans.

18. I am African-American. The students in class were predominantly African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and African-American people like myself. I also believe that RSHT's emphasis on the school's location "on the bus line" in its advertising is an attempt to appeal to African-American students.

19. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: 
ERICKA JOYNER

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that if I attended and graduated from RSHT, I would earn between \$55,000 and \$75,000 a year. They told me that RSHT's career services office would give me extensive assistance in finding a job and that most students were hired as permanent employees at their externship sites.

7. The school did not clearly explain to me what financial obligations I would have to incur to attend RSHT, particularly regarding the amount I would have to repay each month after graduating.

8. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

9. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

10. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. The curriculum just did not match up with the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us.

11. Another significant reason that we didn't learn what we needed to learn at RSHT was that our instructor often changed in the middle of a class. Many of our instructors did not know enough about the subjects they were teaching us to be effective.

12. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

13. Additionally, I didn't have most of the skills that the staff at my externship expected to me know. I didn't have these skills because the skills were not taught to us at RSHT.

14. Even though I have found employment in the field, I now know that the jobs only pay approximately \$12 to \$13 per hour to start.

15. I know very few people from RSHT who have found jobs in their field of study. Many work in industries such as fast food, and not in Surgical Technology.

16. RSHT's career services office provided me with very little help in finding a job. All the career services office did was review my resume.

17. While I have found employment in the field, I only found work through my own efforts.

18. I am supposed to pay over \$150/month on my student loans, but it is very difficult to pay so much. I had to defer my loans for two months earlier this year because of the high monthly payments.

19. I am African-American. The vast majority of students in my program were also African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

20. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: 
DAWN KIDD

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF KIMBERLY LITTLE

I, Kimberly Little, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I attended RSHT from November 2009 to June 2011. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.
3. I left RSHT with over \$10,000 dollars in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to become a certified surgical technician, including the knowledge I needed to pass a certification examination and the required clinical experience.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

7. When I met with RSHT employees before I decided to attend, I had a full-time job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that they would work with my schedule.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn at least \$20.00/hour. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT did not prepare me for the certification exam. I have not signed up to take the certification exam because I know that I'm not adequately prepared. All of my classmates that I know took the exam did not pass. I believe that the biggest reason that they did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

13. Textbooks have also been a major problem. For example, the school refused to provide the existing students copies of the new textbooks that the incoming students and teachers were using. Therefore, the new students and existing students were using different textbooks in the same class. The existing students had to use textbooks that were outdated and missing chapters found in the new edition.

14. Another big problem with RSHT was that the school has not provided us the supplies we were promised. For example, the school had said it would provide separate scrubs for our externship. They did not and I was forced to pay for them on my own.

15. RSHT's promise that they would accommodate my work schedule when it was time for my externship turned out not to be true. Although I worked from 3 p.m. to 9 p.m. as a security guard and asked for a day-time externship, the only externship RSHT offered me was from 3 p.m. to 11 p.m. RSHT told me that I would have to sit out for the externship period if I did not accept this placement. As a result, I coordinated a leave of absence from my job. However, when it came time to go out for the externship, RSHT changed the schedule. RSHT told me that my externship would be pushed back to a later date and that I would instead take another class before beginning the externship. I tried to contact my job and ask for my hours back, but it was too late; they had already given my shift to another person. Even now I have been unable to get back my regular shift as a security guard.

16. I was lucky to receive an externship placement in the operating room at an area hospital. Many of the students in my program were not able to get similar placements and were either forced to leave the program or to go to sites where they would not obtain experience in the operating room. Even though I obtained the 150 surgical procedures required for certification, I am not certified because RSHT did not adequately prepare me to take and pass the certification exam.

17. I have been unable to find a job in the field. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. Even if I could get a job as a surgical technician, I now know that full-time jobs only pay approximately \$14-\$15 per hour.

18. Instead of working as a surgical technician, I am unemployed.

19. I know very few people from RSHT who have found jobs in their field of study.

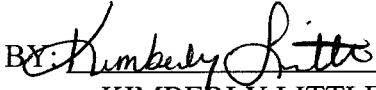
20. RSHT's career services office has done nothing at all to help me find a job.

21. My loans have not yet entered repayment, but I am not sure how I am going to make payments when they become due.

22. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20 2011

BY: 
KIMBERLY LITTLE

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF KATHLEEN MARTIN

I, Kathleen Martin, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from October 2006 until April 2008. The school is also known as “Richmond School of Health and Technology.”
2. I was enrolled in the Medical Billing and Coding program at the Richmond campus. I completed and graduated from the program.
3. I left RSHT with over \$15,000.00 in federal student loans that I cannot afford. I also had to pay approximately \$300 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable practical experience related to medical billing and coding.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified. This was supposed to include the knowledge I would need to pass the certification exam.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in medical billing and coding. They told me that I would earn approximately \$40,000 a year. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, for half of the program, I did not have a teacher. An administrator would periodically check on the class, but we were not given any assignments and had to work

on our own. On several occasions, when there was no teacher available, we were told to sit in on the Medical Assistant classes instead, even though the material covered in these classes was not relevant to billing and coding.

13. Textbooks were also a major problem. Books were included in tuition, but the school gave us out of date books. It took approximately 10 weeks for RSHT to order new books.

14. RSHT did not prepare me for the certification exam. I did not pass the exam the first time I took it because RSHT did not provide adequate instruction or textbooks.

15. When I retook the certification exam a second time, I passed. The only reason I was able to pass was that I studied very hard on my own and ordered my own study guides and textbooks. I do not think I would have passed if I had only studied the material that RSHT gave me.

16. RSHT also failed to give me an appropriate externship. I did my entire externship on campus. Instead of learning firsthand the duties of a billing and coding specialist, I spent 5 weeks in the computer lab or working out of a workbook. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

17. I have tried very hard to get a job as a billing and coding specialist since graduating from RSHT, but I have been unsuccessful. Although I have had several interviews, employers do not want to hire me because I don't have any relevant experience. Having the externship experience that RSHT promised me would have significantly increased my chances of obtaining a job in the field.

18. I know very few people from RSHT who have found jobs in their field of study.

19. RSHT's career services office has given me very little help in finding a job in my field of study. RSHT told me to contact an employer who had hired Medical Billing and Coding

students in the past. But when I went to work there, I found out that it was call center for Medicare and Medicaid and not related to the field of medical billing and coding or what I had studied at RSHT.

20. Instead of working as a billing and coding specialist, I am currently unemployed.

21. My loans have entered repayment, but I am not able to make the monthly payments, which are nearly \$200/month.

22. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: Kathleen P. Martin
Kathleen Martin

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF IBI MBOTO

I, Ibi Mboto, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2008 until 2010. The school is also known as "Richmond School of Health and Technology."
2. I learned about RSHT from television commercials, including advertisements on BET (Black Entertainment Television).
3. I was enrolled in the Surgical Technology program at the Richmond campus. I left the program before completing it.

4. I left RSHT with several thousands of dollars in federal student loans that I cannot afford. I also had to pay over \$60.00 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would give me everything I needed to become a certified surgical technician, including the knowledge I would need to pass a certification examination in my field of study as well as the necessary clinical experience.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

8. They also told me that if I attended and graduated from RSHT, I would get a good job as a surgical technician in a hospital. RSHT told me that after graduating, I would make between \$22-\$28/hour. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school helped me to prepare my financial aid forms and asked me to sign them. I felt rushed to complete the financial aid process, and the school did not clearly explain to me what financial obligations I would have to incur to attend RSHT.

10. RSHT staff assured me that the program was fully accredited. As a result, when I signed up I believed that the academic credits I earned at RSHT would transfer to other educational institutions.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. RSHT created a very difficult learning environment for its students. For example, we did not have consistent teachers. When we were without an instructor, staff from the registrar or bursar's office, who had no background in Surgical Technology, would fill in. At times, teachers would leave mid-module and we would have multiple teachers in one 5-week module. Some teachers were unknowledgeable and inexperienced. This inconsistency in teaching made it very difficult to master the material that we should have been learning in class.

14. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us, including medical instruments. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, we didn't have the supplies to learn how to scrub, which is the most essential component to creating a sterile atmosphere in the operating room.

15. In addition, RSHT did not arrange an externship for me as promised. Getting a proper externship was a crucial part of what my education at RSHT was supposed to provide because certification as a surgical technician requires being on a surgical team for 150 procedures. However, when it came time for me to my externship, RSHT told me that there were no externship placements available. RSHT staff told me that I would have to leave the program until they were able to find an externship site for me.

16. As a result, I was forced to try to arrange one on my own. However, I found that local hospitals did not want to accept me as an extern once they found out I attended RSHT even

though they had student externs from other area schools. I believe that these hospitals were not accepting RSHT students because of the poor reputation of RSHT.

17. Frustrated that RSHT was not providing the externship that they had promised, I had no choice but to leave the program. I decided to enroll at another area college, but during the process of enrolling, I discovered that my credits earned at RSHT would not transfer.

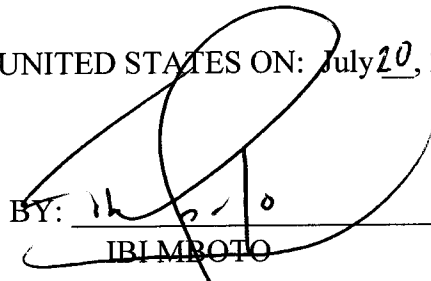
18. I know very few people from my program at RSHT who have found jobs in their field of study.

19. I have been able to defer paying my student loans back for the present time, but I do not know how much those payments will be when they become due. In addition, RSHT claims that I owe them over \$4,000 because I left in the middle of the program, and has filed suit against me in state court.

20. I am African-American. The majority of students at RSHT are African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

21. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: 
IBIMBOTO

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF HERBERT A. MEADE

I, Herbert A. Meade, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until early in 2011. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Surgical Technology program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with thousands of dollars in federal student loans. I also had to make payments out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. I met with RSHT employees specifically to find about entering a Registered Nurse ("RN") program. RSHT told me that it did not have a RN program, but that I should enroll in the school's Surgical Technology program. The admissions person I met with told me that after finishing the Surgical Technology program, I would be able to transfer my credits to another school such as Virginia Commonwealth University or Virginian Union University and apply them toward a RN degree. She also told me that if I worked at a hospital as a surgical technician, I could become a RN through on-the-job training.

6. She also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study. She said that RSHT had relationships with plenty of externship sites so that it would not have difficulty placing me in a good externship.

7. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job as a surgical technician and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. In one instance, an RSHT employee actually forged my initials on a financial aid form. I discovered the forgery when a second RSHT employee asked me to re-sign a document.

After I asked questions about my initials, the second employee admitted that the other employee had committed forgery. The second employee showed me the forged document and shredded it in front of me.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. A significant reason that we didn't learn what we needed to learn at RSHT was that we spent a great deal of time in several classes without a teacher. For example, I did not have an instructor for my pharmacology class. We mostly just sat in pharmacology class without an instructor.

13. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books and sometimes we didn't receive our textbooks for a class until well after the class had already started. Sometimes our instructor had a different edition of a textbook than we had.

14. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, one of our instructors had to make surgical caps into masks in order to conserve materials. Additionally, our mock operating room had very few instruments that it should have had.

15. RSHT also failed to give me an appropriate externship. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Instead, I spent most of my externship in "central sterile," where I only sterilized and packed instruments.

17. I expressed concern to RSHT about getting my 150 cases for the purposes of certification, and refused to return to central sterile. In response, RSHT told me to come to school since there were no externship sites. RSHT made spend the rest of my externship, approximately five weeks, sitting in the computer lab.

18. Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified.

19. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us.

20. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Despite the fact that I have applied to jobs all over the country, I cannot even get an interview. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

21. I know very few people from RSHT who have found jobs in their field of study.

22. RSHT's career services office has given me very little help in finding a job.

23. Instead of working as a surgical technician, I work as a tractor-trailer driver.

24. I also have subsequently discovered that my Surgical Technology credits from will not transfer to another institution and that I cannot apply them toward a RN degree.

25. I am black. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or black people.

26. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a lot of debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: 
HERBERT A. MEADE

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JANA MIRTCHEVA

I, Jana Mirtcheva, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2007 until 2010. The school is also known as “Richmond School of Health and Technology.”
2. I initially enrolled in the Licensed Practical Nursing (LPN) program at the Richmond campus. In the middle of the LPN program, I switched to the Medical Assistant program. I completed and graduated from the Medical Assistant program.
3. I left RSHT with approximately \$14,000 in federal student loans that I cannot afford. I also had to pay \$40.00 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled in the LPN program at RSHT. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to become licensed in my field of study, including the knowledge I would need to pass the state licensing examination, as well as the required clinical experience.

6. They also told me that RSHT would arrange clinicals for me where I would obtain valuable hands-on experience related to my field of study.

7. RSHT staff also told me that the school had excellent teachers.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school helped me prepare my financial aid forms and asked me to sign them. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. When I met with RSHT employees before I decided to attend, I had a full-time job from 3 p.m. to 11 p.m. and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could both attend classes and keep working.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. For instance, the clinicals that RSHT assigned me to did not allow me to continue working at my full-time job as they had promised. I kept arriving at my full-time job late because I was not allowed to leave clinicals early, and eventually I was fired. Losing my job caused a great deal of stress and financial hardship for me, and I was unemployed for about a year.

14. Moreover, the instruction was not adequate for students to learn the required material. One of my classes consisted solely of reading several chapters together during class time and then taking a pop quiz on the material. We were left to study on our own to learn the material. When I tried to ask my instructor for help on content I did not understand, she was not available to answer my questions. As a result of the poor instruction, I was unable to pass the exam at the end of the class. I re-took the class, but had the same teacher and the same difficulty learning the material. When I took the exam for the second time, again I was not able to pass it.

15. The course I failed was a required course for the LPN program and RSHT told me I could only take it twice. As a result, when I did not pass the second time, I was forced to leave the program.

16. Frustrated with my experience but still wanting to get an education in the health professions, I switched to the Medical Assistant program in the hopes that it would provide me with better training. Before I enrolled in the Medical Assistant program, an RSHT employee told me a number of things that did not turn out to be true.

17. For example, she told me that attending and graduating from RSHT would give me everything I needed to become a certified medical assistant, including the knowledge I would need to pass the certification examination.

18. She also told me that RSHT would arrange an externship for me where I would obtain valuable hands-on experience related to becoming a medical assistant.

19. She also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. She told me that RSHT's career services office would give me extensive assistance in finding a job.

20. The school helped me prepare my financial aid forms and asked me to sign them. RSHT did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

21. In making my final decision to enroll in the Medical Assistant program, I relied on the promises that the school made to me like the promises described in paragraphs 17 to 19 above.

22. However, the Medical Assistant program had numerous problems as well. For example, the Medical Assistant program at RSHT did not prepare me for the certification exam. I did not take the exam because I do not think I would have passed if I had only studied the material that RSHT taught us. Almost everyone I know who took the certification exam failed it. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

23. Another major reason that we didn't learn what we needed to learn at RSHT was that we didn't always have a teacher. One of our teachers was suddenly fired in the middle of a module. That teacher's replacement would often fail to show up to class. There was also a period of time during which we had no teacher assigned to our class at all. During this time, an RSHT administrator who was not experienced in my field would simply give us assignments and

then come in the next day and go over the answers to these assignments. There was no instruction at this time and we were left to study on our own.

24. Textbooks were also a major problem. For example, even though books were included in our tuition, we didn't receive our textbooks for our business class until a few weeks after the class had ended.

25. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, we lacked basic supplies such as needles and blood pressure cuffs. We also did not have a refill pack for a mechanical arm that was supposed to simulate the experience of drawing blood.

26. When I and other students complained about the quality of instruction and the lack of equipment and supplies, RSHT never addressed our concerns.

27. RSHT did a poor job in arranging my externship. At first, the school sent me to an externship that wanted me to have completed several training classes before beginning my externship. As a result, I was not able to complete this externship because I was not adequately prepared by RSHT and did not have time to complete these courses before the externship was to begin. I told RSHT that the site was not appropriate and asked that they find me a new placement. While they did find me a new site, I did not receive the details about where I would go until two days before I was to start there.

28. I have tried to get a job as a medical assistant after graduating from RSHT, but I have been unsuccessful. I believe employers do not want to hire RSHT graduates because the school does such a poor job of educating and training its students.

29. Instead of working as a medical assistant, I work at a hair salon.

30. I know very few people from RSHT who have found jobs in their field of study.

31. After I graduated in 2010, RSHT's career services office offered me very little help in finding a job. All the career services office did was email me job listings that I could find myself online.

32. Since this lawsuit was filed, the school has contacted me numerous times offering career services assistance. I have not followed up because I do not believe RSHT can help me find a job in the field.

33. I am supposed to pay over \$100 per month for my student loans, but I cannot afford to pay so much. My loans are currently in forbearance. I do not know how I will make the payments once the forbearance period expires.

34. I am white. The majority of students at RSHT are African-American.

35. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: Jana Mirtcheva
JANA MIRCHEVA

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF PATRICIA MITCHELL

I, Patricia Mitchell, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2010, when I completed my coursework. I formally graduated from RSHT in 2011. The school is also known as "Richmond School of Health and Technology."

2. I was initially enrolled in the Surgical Technology program at the Richmond campus. I then transferred to the Surgical Technology program at Chester. I completed and graduated from the program at Chester.

3. I left RSHT with about \$20,000 in federal student loans that I cannot afford. I also had to pay around \$140.00 out of my own pocket to RSHT every five weeks.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to work as a certified surgical technician, including the knowledge I would need to pass the certification exam and the necessary clinical experience. RSHT told me that the cost of my certification exam would be covered by financial aid.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would offer job placement.

8. They also told me that the school was fully accredited, and any credits I earned would transfer to other educational institutions.

9. RSHT told me that after I graduated, I would have no problem paying back the loans I had taken out. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT did not prepare me for the certification exam. I have not signed up to take the certification exam because I know that I'm not adequately prepared. The content of the curriculum just did not match up with the questions on the exam, and I would have to invest considerable time to learn the material necessary to pass the exam on my own.

13. In addition to feeling that I was not prepared, I also did not have the money to pay for the cost of certification exam. Although RSHT had told me that they would pay for me to take the exam, I found out that was not true around the time that I was completing the program.

14. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. At times, an RSHT administrator would come in and read to us out of the textbook and then dismiss us early. Other times, we would just sit in class without instruction, or simply leave early.

15. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, RSHT placed new students into classes that were already in progress. This meant that within my class, we had students who were just beginning and students who were way ahead. This created a very difficult learning environment.

16. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books.

17. Another big problem with RSHT was that the school did not have enough medical equipment and supplies, including medical instruments. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

18. I was lucky to receive an externship placement in the operating room at an area hospital. Many of the students in my program were not able to get similar placements and had to go to sites where they would not obtain experience in the operating room. Even though I obtained the 150 surgical procedures required for certification, I am not certified because RSHT did not adequately prepare me to take and pass the certification exam. Even if I was prepared, I could not afford to pay for the exam myself.

19. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

20. I know only one person from RSHT who has found a job in her field of study.

21. RSHT's career services office has not given me any help in finding a job. They have never even reviewed my resume.

22. Instead of working as a surgical technician, I am about to begin a job as a certified nursing assistant (CNA). I earned my CNA license years before I attended RSHT. The position is not at all related to what I studied at RSHT.


23. I was able to defer payment on my student loans, but I do not know how I am going to make the payments when the deferral period is over.

24. I am African-American. The majority of RSHT students are African-American. I think the RSHT intentionally targets its marketing and recruiting at lower-income and African-American people like myself.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a

mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20 2011

BY: 
PATRICIA MITCHELL

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF QAMARAH NASIR

I, Qamarah Nasir, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2004 until 2005. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Medical Assistant program at the Richmond campus. I completed and graduated from the program.
3. I left RSHT with over \$4,000.00 in federal student loans that I cannot afford.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to becoming a medical assistant.

7. RSHT told me that if I attended and graduated from RSHT, I would get a good job with a good salary. They told me that RSHT's career services office would give me extensive assistance in finding a job.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

10. The education I received from RSHT did not even come close to living up to the school's promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. This is because my classes at RSHT taught only the most basic information. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class.

12. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, when we were learning how to draw blood, we practiced on straws and oranges because RSHT did not have the appropriate equipment for us to practice on.

13. I also experienced problems with my externships because I didn't have most of the skills that the staff at my externship sites expected to me know. I didn't have these skills because the skills were not taught to us at RSHT.

14. For example, I did not feel confident at my externships because of the poor training I received at RSHT. My first externship was at a doctor's office. The doctor expected me to assist during a pap smear, but I had no idea what to do and I gave the doctor the incorrect instrument during the procedure. At my second externship, I was asked to draw a patient's blood but did not know how to do it properly.

15. After graduating, the only job RSHT helped me to find was not as a medical assistant, but rather as a residential counselor for adults with mental disabilities. This job didn't require any specialized medical training.

16. Instead of working as a medical assistant, I now work part-time during the academic year in a school cafeteria.

17. When my medical assistant certification expired soon after I graduated, I had no choice but to allow it to expire because keeping the certification valid was costly and I could not find a job. I have never had a job as a medical assistant, and even though RSHT led me to believe the program offered a valuable certification. Many employers do not want to hire RSHT

graduates because they know that RSHT does such a poor job of educating and training its students. Moreover, many employers do not recognize the certification I earned through RSHT.

18. I know very few people from RSHT who have found jobs in their field of study.

19. My student loans are currently in forbearance due to economic hardship. I am not sure how I will make the payments when the forbearance runs out.

20. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and African-American people like myself.

21. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: 
QAMARAH NASIR

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF LATISHA NEAL

I, Latisha Neal, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2010. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Medical Billing and Coding program at the Chester campus. I completed and graduated from the program.
3. I left RSHT over \$5,000.00 in federal student loans that I cannot afford. I also had to pay \$40.00 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study. I was also told the certification exam fee would be covered by the cost of tuition.

6. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

7. The school filled out a lot of my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. Every time I had a question about financial aid, the person I spoke with said that a supervisor needed to be consulted. I did not even understand the extent to which I had taken out loans—as opposed to receiving financial aid—until after I had signed my enrollment agreement.

8. RSHT also told me that while the Medical Billing and Coding program was not an associates' degree program at that time, the school was currently in the process of converting it into an associates' degree program. They told me that it would switch to the associate's degree program and graduate with that degree.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us.

12. Additionally, when the time came for me to take the certification exam, the school told me that I had to borrow additional money from the federal government to pay for the test.

13. Another big reason that we didn't learn what we needed to learn at RSHT was teacher attendance. For example, one of our teachers would sometimes simply not show up to class. Additionally, this instructor went on a two-week vacation and left us with a substitute. The substitute teacher would come in and, instead of teaching us, would just tell us to read a chapter in a textbook or tell us to sign an attendance sheet and leave.

14. Additionally, at one point in the program, we simply did not have a teacher.

15. The classes at RSHT were also difficult places to learn because students would start in the middle of an instruction period and then would experience new students joining the same class. Therefore, people in the same class were often at different points in the curriculum. This created a very difficult learning environment.

16. Textbooks were also a major problem for many students. While I had new textbooks, people who were already in the class had older books. People with new books had to share with people who had older books. Additionally, the instructors would often be using a different textbook than the students.

17. Another problem with RSHT was that the school did not have enough functioning computers for everyone in my class to use. In our computer lab, about half of the computers did not work.

18. We also found out halfway through the program that Medical Billing and Coding at RSHT would remain a certificate program and was not going to be changed to an associates' degree program. This was very upsetting to myself and many other students.

19. I have tried very hard to get a job as a medical billing and coding professional since graduating from RSHT, but I have been unsuccessful. I believe that many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

20. I have also learned that the certification exam that RSHT arranges for us to take, which is given by the National Center for Competency Testing, is not recognized by most employers. Employers instead generally recognize a different organization's certification for medical assistants, but RSHT students cannot take the other organization's certification examination.

21. I know very few people from RSHT who have found jobs in their field of study.

22. RSHT's career services office has given me very little help in finding a job. Any job leads that the school posted on its jobs board were simply pulled from the internet. Whenever I would speak with the career services person, she was not very helpful. For example, I sent her my resume for her to review, and she never followed up with me.

23. Around graduation, I requested a meeting with career services, but the career services person was not at school. I met with another person at RSHT who simply had me fill out a form so that the school could keep in touch with me with job postings. There has not been any follow up.

24. Instead of working as a medical billing and coding professional, I am unemployed. Despite having applied for many jobs, I have not been able to find work. I became

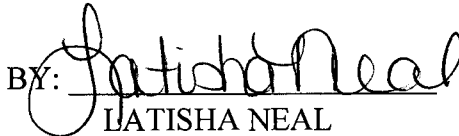
frustrated and allowed my medical assistant certification to expire instead of paying more money to renew it. I do not feel doing the recertification now is worthwhile because I cannot find a job.

25. I am supposed to pay over \$50.00/month on my student loans, but I cannot afford to pay so much. I was able to defer repayment twice, but I do not know how I am going to make the payments when the deferment is schedule to end in September 2011.

26. I am African-American.

27. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: 
LATISHA NEAL

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JUDITH NICHOLE PATTERSON

I, Judith Nichole Patterson, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT August and September of 2010. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Medical Billing and Coding program at the Richmond campus for one 5-week module.

3. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

4. For example, they told me that attending and graduating from RSHT would give me everything I needed to work in medical billing and coding.

5. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They pushed me towards the Medical Billing and Coding program by telling me that the job market in the field was huge and I would earn a good salary. They told me that RSHT's career services office would give me extensive assistance in finding a job.

6. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. They told me that I was getting a Pell grant which would cover my tuition, and that there were loans in case the Pell grant ran out. The school filled out my financial aid paperwork for me and told me to sign the forms. I did not understand that by signing the forms, I was taking out loans. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

7. They also told me that the teachers at RSHT were knowledgeable and that the small classes created a great learning environment.

8. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 4 to 7 above.

9. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

10. For example, the classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, RSHT placed new students into classes that were already in progress. This meant that within my class,

many of the students were getting ready to graduate as I was starting. This created a very difficult learning environment.

11. Another problem with RSHT was the poor quality of instruction. Much of the time, my teacher would sit with the same two students for the whole class period and everyone else would have self-study. My teacher did not explain the concepts we were supposed to be learning and tests were often open book. I learned more from studying on my own than I did in class.

12. The classes at RSHT were also difficult places to learn because the curriculum was disorganized. For example, I had to take classes that covered how to enter medical codes and add and subtract billing entries before I completed basic education classes.

13. Another problem with RSHT was inadequate classroom space. We would have to switch rooms frequently because other classes were using the rooms where we had been meeting.

14. After a few weeks in the program, an RSHT staff member came into the class to talk about jobs in the field and told us that it was a bad job market. My classmates and I were upset and surprised to hear this.

15. As a result of this news, I went to talk to RSHT administration about leaving the program. I was told that if I left, I wouldn't be eligible for financial aid or loans in the future.

16. RSHT's administration talked to me about switching programs instead of dropping out of the program. I took the placement test for the Licensed Practical Nursing program, but I did not pass. They told me that the Community Home Health program was full and suggested the Medical Assistant program as an alternative. I tried to stick it out in the Medical Billing and Coding program for a few more weeks, but then I informed RSHT in writing that I was not coming back.

17. I first learned that I had student loans upon leaving RSHT. An RSHT administrator told me that if I quit the program, I would be responsible for my loans. I asked what loans he was talking about since I had never received a bill or loan statement of any kind.

18. I know very few people from RSHT who have found jobs in their field of study.

19. Instead of working in medical billing and coding, I went to another school to complete a Certified Nursing Assistant (CNA) program and am working in that field.

20. I am Native American and white. The vast majority of students at RSHT are African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

21. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: Judith Nichole Patterson
Judith Nichole Patterson

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF IRENE SHOKUNBI

I, Irene Shokunbi, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I have been a student at RSHT since March 2010. The school is also known as “Richmond School of Health and Technology.”
2. I am enrolled in the Community Home Health (CHH) program at the Richmond campus.
3. I left RSHT with over ten thousand dollars in federal student loans that I cannot afford. I also had to pay around \$89 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn at least \$12 an hour, and that I would earn more than a certified nursing assistant. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 10 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. I learned near the end of the CHH program that there is no such thing as certification in "community home health" in Virginia and that RSHT did not know what certification examination I and the other CHH students would take. The school decided that we should take the Patient Care Technician (PCT) certification exam. I decided not to take that exam because working as a PCT was a much lower level of certification than I had been promised.

13. I, and many other CHH students, were very upset with how RSHT handled the CHH program and the certification issue. We complained, and the school arranged for us to take a six-week Certified Nurse Aide (CNA) Training Program at another school, the Professional Career Institute. I do not plan to enroll in this program when I graduate from RSHT. RSHT promised me a certification higher than a CNA, and I paid more than \$10,000 to become a community home health care professional. The program at PCI costs RSHT less than \$1,000 and provides a lower level of certification than I was promised.

14. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books.

15. In addition, the externship did not turn out the way I expected. The school tried to set me up with an externship in Colonial Heights, but that was too far for me to travel with my day job. Although externships were required to graduate, I was forced to try to arrange an externship on my own. I sought an externship placement at various sites and explained that I was a student in home health care, but no one recognized the program or had ever heard of this degree.

16. Almost six months after I finished classes, a classmate informed me that the school had a new externship site in Richmond. I called RSHT immediately to sign up, and had to pay a \$75 readmission fee.

17. I started my externship at Comfort Keepers in May 2011. Instead of gaining firsthand experience in home health care, I spent most of my time doing tasks that did not require any medical training and were not related to my field of study. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

18. I know very few people from RSHT who have found jobs in their field of study.

19. I do not believe I will be able to work as a home health care professional when I graduate from RSHT because I have not had the appropriate experience and externship. Instead, I will have to continue working as a security officer, the job I had before I began the CHH program.

20. I am supposed to pay over \$100 per month on my student loans, but I cannot afford to pay so much. I was able to defer repayment for a year, but I do not know how I am going to make the payments when the year is over.

21. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: Irene Shokunbi
Irene Shokunbi

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JENNIFER SNOTHERLY

I, Jennifer Snotherly, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from March 2010 until April 2011. The school is also known as "Richmond School of Health and Technology."

2. I learned about RSHT from seeing ads on TV. The ads said RSHT had career counseling and good job placement. I also looked at the school's website which said the same thing.

3. I was enrolled in the Medical Assistant program at the Chester campus.

4. I left RSHT with thousands of dollars in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to the medical assistant profession.

7. They also told me that attending and graduating from RSHT would give me everything I needed to work as a medical assistant.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. I came into RSHT's admissions office interested in joining the Licensed Practical Nursing (LPN) program, but staff in the office talked me out of it, telling me that I could do more as a Medical Assistant. They told me that a Medical Assistant was "higher" than an LPN, made more money than an LPN, and would offer me greater job opportunities. They told me that I would have no problem finding a job, and that RSHT's career services office would give me extensive job placement assistance, including career development classes and resume-writing help.

9. The school filled out my financial aid paperwork and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, the classes at RSHT were difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, new students moved into classes that were already in progress so that half the people would be finishing as new students were starting. This created a very difficult learning environment and often the teacher could not keep track of what material different people in the class had covered.

13. The classes at RSHT were also difficult places to learn because the curriculum was disorganized. For example, I took advanced classes in my field of study before completing basic education classes.

14. Textbooks were also a problem. Books were included in tuition, but some students had out of date books. That made instruction difficult because the information in their books would contradict the information in mine. Sometimes we didn't receive our textbooks for a class until after the class had already started and we would have to borrow books from each other or rush to make photocopies. In addition, there were one or two textbooks that I never received at all.

15. Another major problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. Another problem with RSHT was the poor quality of instruction. Many of my teachers were inexperienced and unknowledgeable. They gave assignments straight from the book without explaining concepts or answering questions.

17. RSHT also failed to give me an appropriate externship. I started doing my externship at Riverside Regional Jail. Instead of learning firsthand how to be a medical assistant and to perform tasks like drawing blood or administering medication, I spent most of my time waiting around or running errands for the jail's staff. I later began another externship at a doctor's office. Instead of interacting with patients or taking their vital signs, I spent most of my time answering phones. Neither externship was a valuable experience. Neither was at all like what RSHT told me to expect.

18. Another problem with my first externships was that I didn't have most of the skills that the staff at the jail expected me to know. The jail needed me to have hands-on experience with tasks like drawing blood. I didn't have that experience because it was not taught to me at RSHT.

19. Another problem with RSHT is that the administrators were unresponsive. One administrator told me that I could not return to my second externship until I scheduled an in-person meeting with another administrator. The school never followed up with me about this meeting or returned repeated phone calls and messages I left at RSHT. As a result, I was forced to leave the program without completing the externship requirement.

20. I don't know any classmates from RSHT who have found jobs in their field of study.

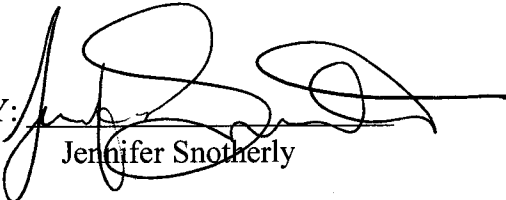
21. Instead of working as a medical assistant, I am unemployed.

22. My loans have not yet entered repayment, but I do not know how I am going to make the payments when they begin.

23. I am white. The vast majority of students in my program were African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: 
Jennifer Snotherly

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF SHANELLE THOMAS

I, Shanelle Thomas, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2007 until 2009. The school is also known as “Richmond School of Health and Technology.”
2. I learned about RSHT in a newspaper advertisement.
3. I was enrolled in the Surgical Technology program at the Richmond campus. I completed and graduated from the program.

4. I left RSHT with more than \$10,000 of dollars in federal student loans that I cannot afford. I also had to make monthly payments of over \$50 out of my own pocket to RSHT. When I was late in making this payment once, RSHT did not allow me to attend classes.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and led me to believe that I would not have any difficulty obtaining one. They provided me with handouts that discussed salaries for surgical technicians. They led me to believe that after graduating from RSHT, I would earn over \$35,000 as a surgical technician.

7. They told me that RSHT's career services office would provide extensive job placement assistance.

8. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

9. The school filled out my Free Application for Federal Student Aid (FAFSA) for me and told me to sign the forms.

10. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that I could complete my externship in the evening.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. For example, RSHT did not prepare me for the certification exam. I have not yet taken the certification exam but I did take a practice exam. I do not think I could pass the exam by studying only the material that RSHT taught us because the exam includes many subjects that were not covered in our classes at RSHT.

14. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, we could not do lab work because our lab was not adequately set up and we could not practice unpacking gowns and gloves and keeping them sterile as often as we needed to because the school made us reuse gowns and gloves.

15. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Because RSHT did not arrange for externships in a way that would allow me to complete all 150 procedures, I could not reach the required number of procedures. Therefore, I cannot be certified.

16. After completing a number of procedures at my first externship, I spent my next two externships in "central sterile," where I only sterilized and packed instruments. The time spent in central sterile does not count toward the 150 procedures. Even though I completed more

procedures at a subsequent externship, I could not reach the required number of procedures while working there.

17. Despite the school's promise to me, RSHT assigned me to daytime externships. I tried to keep my job and complete the externships, but I lost my job because of the time I had to spend at the externship. Completion of the assigned externships is a requirement for graduation at RSHT. I would not have lost my job if RSHT had kept its promise that I could complete the program in the evenings.

18. Another problem with my externships was that I didn't have most of the skills that staff at my externships expected to me know. I didn't have these skills because the skills were not taught to us at RSHT.

19. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT's career services office has given me very little help in finding a job. RSHT never set up any interviews for me or made any real effort to place me in a job.

22. Instead of working as a surgical technician, I have enrolled at another school to get my bachelor's degree. Since my credits did not transfer, I feel as though I have a degree from RSHT that is basically worthless.

23. I am African-American. Most of the students in my program were African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: 
SHANELLE THOMAS

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF ANDRE TYLER

I, Andre Tyler, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from January 2009 until December 2010. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Surgical Technician program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with over \$10,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange a 15-week externship for me where I would obtain valuable clinical experience related to my field of study, including a 10-week externship in an operating room.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become certified as a surgical technician. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

7. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that I would earn at least \$40,000 a year. They told me that RSHT's career services office would give me extensive assistance in finding a job.

8. Before enrolling in the program, I told RSHT that I had a misdemeanor conviction from four years earlier. I asked if that would be a problem for me as a student or when it came time to apply for jobs in the field. RSHT assured me that it would not be a problem.

9. The school completed my financial aid paperwork and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT did not prepare me for the certification exam. I failed the exam the first time I took it because the material on the exam did not match up to the material we learned in class. I took the exam a second time and passed it, but only because I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed the second time if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

13. A major reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. One time we didn't have an instructor for two weeks. During that time, RSHT administrators would come in and give us assignments from the syllabus to complete on our own. There was a lot of turnover in teachers which made it hard for students who were struggling to learn the required material.

14. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, RSHT placed new students into classes that were already in progress. This meant that within my class, we had students who were just beginning and students who were way ahead. This created a very difficult learning environment.

15. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us, including medical instruments, gowns, and gloves. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for

150 procedures. Instead, RSHT sent me to “central sterile,” where I only learned to sterilize and pack instruments. I ended up spending all 15 weeks in central sterile even though RSHT administrators continued to promise me an externship in the operating room that would count towards certification. At the time I graduated, I had not completed any of the 150 required procedures. As a result, even though I have passed the written exam, I am not eligible for certification because I did not have the opportunity to complete the necessary surgical experiences during my externship.

17. I was upset with how RSHT handled my externship placement. When I complained to school administrators about the problem, they responded by telling me that I could not get an externship placement at a hospital because I had a misdemeanor. I was upset at this news because I had talked to RSHT about this very issue before I enrolled, and they assured me that it was not a problem.

18. I started applying for jobs as surgical technician even before I graduated from the program. I have tried very hard to find employment as a surgical technician since graduating and passing the certification exam, but I have been unsuccessful. I applied for over 50 jobs in the field, without receiving any offers. Employers have told me that the problem with my application is that I am not certified. Even though certification is not technically required to work as a surgical technician, in practice it is what employers want to see in job applicants.

19. RSHT’s career services office has not helped me in finding a job. All the career services office did was send me one email with two job postings that I had already found myself online. When I visited the career services office in person for more assistance, RSHT staff told me that they would follow up with me. No one ever did.

20. Instead of working as a surgical technician I work at Greater Richmond ARC, a local nonprofit organization, as a custodian.

21. My loans have entered repayment, but I cannot afford to pay them back.

22. I am African-American. The majority of students in my program were African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: Andre Tyler
Andre Tyler

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF SHEENA TYLER

I, Sheena Tyler, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from September 2007 until the beginning of 2010. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Surgical Technology program at the Richmond campus.
3. I left RSHT with thousands of dollars in federal student loans that I cannot afford.

I also had to pay \$40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to work in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that the classes I would need to take were offered in the evenings.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. Classes at RSHT were difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, RSHT placed new students into classes that were already in progress. This meant that within my class, students would be studying different parts of the same chapter depending on when they entered the program. This created a very difficult learning environment.

14. In addition, other resources at RSHT were also lacking. Computers in the computer lab were broken and usually there were no printers that students could use. The school library did not have many books.

15. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us, including medical instruments. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. RSHT also failed to give me an appropriate externship. I did a ten week externship at Henrico Doctors' Hospital. Instead of learning firsthand how to be a surgical technician by observing surgery and assisting doctors in the operating or emergency room, I spent all of my time cleaning instruments. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

17. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Instead I spent ten weeks of my internship in "central sterile," where I only sterilized and packed instruments. I can graduate from RSHT by completing another five weeks

of externship, but I still will not have the 150 procedures required for certification because the school did not arrange a proper externship for me for the first ten weeks.

18. RSHT's promise that I could complete the program in the evenings also turned out not to be true. The only externship placement available to me in the evenings was central sterile, but central sterile does not provide the hands-on operating room experience required for certification. Employers generally want surgical technicians to be certified, especially if they do not have substantial operating room experience.

19. I know very few people from RSHT who have found jobs in their field of study.

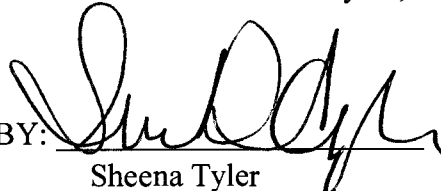
20. Instead of working as a surgical technician, I work for Virginia Premier Health Plan as a data entry clerk.

21. I am supposed to pay over \$100/month on my student loans, but I cannot afford to pay so much. I was able to place my loans in forbearance, but recently learned that I no longer qualify for forbearance. I do not know how I am going to make the payments.

22. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: 
Sheena Tyler

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF L'TANYA WALKER

I, L'Tanya Walker, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from May 2007 until March 2009. The school is also known as "Richmond School of Health and Technology."

2. I learned about RSHT by looking online for X-Ray Technician programs. RSHT listed Radiologic Technology on their website as a program that they offered. I called RSHT and inquired specifically about the X-Ray Technician program. I made an appointment to meet with RSHT staff in person but when I went in they told me they weren't offering the X-Ray Technician program at that time.

3. A RSHT employee from the admissions office suggested that I enroll in the Surgical Technology program at the Chester campus. I completed and graduated from the program.

4. I left RSHT with more than \$10,000 in direct federal student loans that I cannot afford. I also left with several thousands of dollars in loans from Sallie Mae that I cannot afford.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a examination in my field of study that I would take at the end of the program. I later learned that this was the certification examination.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to work in my field of study. This was supposed to include the knowledge I would need to pass the exam and the necessary clinical experience.

9. They also guaranteed that if I attended and graduated from RSHT, I would get a good job in my field of study and would earn at least \$17 per hour. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. They also told me that most of the cost of attending RSHT would be covered by loans that I would not have to begin repaying until after I finished the program.

11. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. For example, RSHT did not prepare me for the certification exam. I have not tried to take the exam in large part because I do not feel well-prepared after completing the program at RSHT. I do not believe that RSHT taught us what we needed to know to pass the exam.

15. One of the reasons we didn't learn what we needed to learn at RSHT was that often we would get a different teacher for each "module." A module is only five weeks long. This was very disruptive.

16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. A significant part of my externship was in a doctor's office, however, where I did not get any surgical experience.

17. Another problem with my externship was that when I did get into the operating room, I did not feel comfortable because I didn't have enough preparation. RSHT should have given us more preparation before I was in the operating room on my externship.

18. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. I work at a hospital now in "central sterile." This position

involves cleaning and sterilizing instruments but does not require any education in surgical technology. I applied for an Assistant Surgical Technician job at the same hospital and was told that I was not qualified.

19. I know very few people from RSHT who have found jobs in their field of study.

20. RSHT's career services office has given me no help in finding a job. All the career services office did is tell me to type up my resume.

21. I started out in my job in central sterile earning \$10/hour and am now up to \$12/hour. This job will not help me find a surgical technician job because it provides no opportunity to gain experience in the operating room.


22. About half a year into my classes at RSHT, I discovered that I was supposed to start making payments on my Sallie Mae loan, even though RSHT had told me that I would not have to start repaying my loans until after I graduated. I went to talk to RSHT administrators about this and they told me that the way they had filled out my financial aid forms, I would have to start paying the loan back before I graduated.

23. I am supposed to pay over \$150 per month on my federal student loans and over \$100 per month on my Sallie Mae loans, but I cannot afford to pay so much. My direct loans are currently in forbearance, but I do not know how I am going to make the payments when the forbearance period ends. Even with the federal loans in forbearance, it is extremely difficult to make the payments on the Sallie Mae loans.

24. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and African-American people.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: 
L'Tanya Walker

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF SANDRA WHITE

I, Sandra White, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2011. The school is also known as “Richmond School of Health and Technology.”
2. I was enrolled in the Surgical Technology program at the Richmond campus. I completed and graduated from the program.
3. I left RSHT with about \$20,000 in federal student loans that I cannot afford. I also paid between \$50 and \$60 each month to RSHT out of my own pocket.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience in the operating room. They said that out of the 15 week externship, I would complete 10 weeks in an operating room.

7. They also told me that if I attended and graduated from RSHT, I was guaranteed a good job as a surgical technician. They told me that I would earn approximately \$19 to \$20 per hour. They told me that RSHT's career services office would find me employment when I graduated.

8. The school prepared my financial aid forms and asked me to sign them. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the

material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

12. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, the school constantly rotated new students into my classes who were at different points in the curriculum. As a result, we would often have to jump ahead or slow down to accommodate the new students' schedules. Additionally, these newer students were working out of different textbooks. This created a very difficult learning environment.

13. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies, including medical instruments. The instruments RSHT did have were often broken. We also did not have basic supplies such as gowns or hats. The supply shortage was so severe that one of my instructors asked for donations from her work so that we could have basic equipment, such as gloves.

14. RSHT also failed to give me an appropriate externship. I did my externship at Henrico Doctors' Hospital (Forest Campus). My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

15. Getting a proper externship was a crucial part of what my education at RSHT was supposed to provide because certification as a surgical technician requires being on a surgical team for 150 procedures. Instead I spent all of my externship in "central sterile," where I only sterilized and packed instruments. Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified.

16. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. I also lack experience in the operating room that employers look for because RSHT did not provide me any externships in the operating room.

17. I don't know anyone from RSHT who has found a job in his or her field of study.

18. RSHT's career services office has given me very little help in finding a job. All the career services office did was provide a board with job postings that I found myself on the internet.

19. Instead of working as a surgical technician, I am unemployed.

20. I am currently within the six-month grace period for my student loans, but will have to start repaying them next month. I have no idea how I will make the payments, which are over \$200/month.

21. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: 
SANDRA WHITE

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JOLISA WILLIAMS

I, Jolisa Williams, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT between 2006 and 2007. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Medical Assistant program at the Chester campus.
3. I left RSHT with over \$10,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn about \$36,000 a year. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. When I met with RSHT employees before I decided to attend, I had a part-time day job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that the externship I would need to complete would be offered in the evenings.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. For example, we didn't learn what we needed to learn at RSHT because of the lack of quality and consistency in the instruction. It seemed that every couple months, we had a new teacher. Sometimes we didn't have a teacher at all. Even when we did have a teacher, the teacher would often end the class as much as two hours before it was scheduled to end.

14. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. If the school had not yet lined up an instructor for the next class in our sequence, we had to skip ahead to a more advanced class, and then return later to the introductory class. This created a very difficult learning environment.

15. Textbooks were also a major problem. Books were included in tuition, but sometimes we didn't receive our textbooks for a class until weeks after the class had already started.

16. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We were always reusing old supplies. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

17. In addition, RSHT did not arrange an appropriate externship for me as promised. The externship the school arranged for me was during the day, even though I had a day job. Instead, I had to arrange an externship on my own, even though it was required to graduate, and I was not able to find one on my own in the evenings. In order to participate in the daytime

externship that I was able to find on my own, I had to cut my hours at work approximately in half and switch to the night shift. I could not afford to finish the externship because of the huge financial strain on my family. I tried several times to go back and finish the externship, but RSHT told me that I could not, and that my only option was to start all over with the basic courses.

18. Because RSHT did not find me an externship in the evenings, I was not able to complete the Medical Assistant program. I had to leave the program because of the financial hardship even though I had completed almost all of the graduation requirements.

19. I know very few people from RSHT who have found jobs in their field of study.

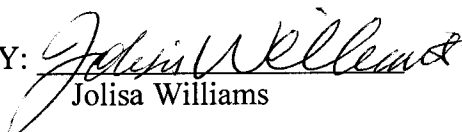
20. Instead of working as a medical assistant, I work at Sam's Club.

21. I was originally supposed to pay over \$200 per month on my student loans, but I could not afford to pay so much. I had to default on my loans. I am now required to pay \$116 per month, which is very hard for me to do.

22. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: 
Jolisa Williams

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF REGINA WILLIAMS

I, Regina Williams, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2007 until 2008. The school is also known as “Richmond School of Health and Technology.”
2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.
3. I left RSHT with about \$16,000.00 in federal student loans that I cannot afford. I also was required to pay an additional amount out of my own pocket.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

8. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. The school simply told me that these forms had something to do with the federal government.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. One big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, one of my instructors left in the middle of a module.

12. When we did have instructors, they were not always trained as surgical technicians. For example, one teacher was actually a radiology instructor and not trained as a surgical technician. She did not have the knowledge to teach our class effectively. Two other instructors were retired Registered Nurses and also did not have training as surgical technicians. Those two instructors would just sit in the classroom while other students and I worked out of our books.

13. Whenever students in my program raised concerns about not having instructors, the administration never responded to these students or concerns.

14. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

15. For example, the lab did not have the correct instruments that we needed to learn. Instead, we were forced to work with what the school had on hand. We also had to look at books for pictures of medical instruments because the school did not actually have the instruments we needed.

16. RSHT also said they would install a "scrub up" sink in the lab, which would allow students to practice scrubbing themselves, as they would before surgery. When I graduated from RSHT, there was still no scrub up sink.

17. RSHT's library did not have the necessary resources to help us write papers for our classes.

18. Furthermore, getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for at least 150 procedures. I arranged for my own externship at my current

employer because I had already been employed there as an Operating Room Aide. The only reason I currently have a job as an Operating Room Technician at the place I completed my externship is because of my own efforts. RSHT did not provide me with any job placement assistance.

19. Many of my classmates were not as fortunate. During my time as a student at RSHT, I observed the school sending out students to externships before they had completed the classroom component of the curriculum. This did not make sense, since there were numerous students who had already completed the classroom component of the program without externship placement. The process of externship placement was extremely disorganized.

20. RSHT also told me that the first test for certification in my field of study was included in the tuition, and that it did not matter when I took the exam. However, when I decided to take the exam after completing the program, the school told me it was no longer willing to pay for it. The cost of exam registration exceeds \$100.00, and I cannot afford to pay for it. As a result, I have not yet taken the certification exam.

21. While I believe I could take the certification exam and pass, it is only because of my experience working in the field. RSHT did not prepare me for the certification exam. Some of the material tested on the exam is not related to what we studied in my classes. I do not think I would be able to pass if I relied only on the material that RSHT taught us.

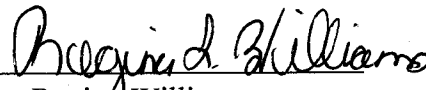
22. My loans are currently in forbearance. I am supposed to pay over \$100 per month, but I cannot afford to pay so much. I am not sure how I will pay the loans back when the forbearance period ends.

23. I know very few people from RSHT who have found jobs in their field of study.

24. I am African-American. The majority of my classmates at RHST were African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Since I taught myself most of the material, just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I feel as though I could have gone to nursing school for less money than I paid to enroll in RSHT's Surgical Technology program. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: 
Regina Williams

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF TIANNA WILLIAMS

I, Tianna Williams, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from spring 2009 until spring 2011. The school is also known as “Richmond School of Health and Technology.”
2. I learned about RSHT through ads on TV and on R&B and hip-hop radio stations like 92.1 and 106.5.
3. I was enrolled in the Licensed Practical Nursing (LPN) program at the Richmond campus.

4. I left RSHT with thousands of dollars in federal student loans that I cannot afford. I also had to pay at least \$40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. They told me that attending and graduating from RSHT would give me everything I needed to become licensed as a LPN.

7. They also told me that the school would arrange externships for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job and would have an excellent chance of obtaining one as an LPN. They told me that I would earn \$30,000-40,000 a year. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. They also told me that the school offered free tutoring. The school knew when it told me this that I was going to attend evening classes, but did not say anything about tutoring only being available during the day.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. For example, one big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, I had to sit out of the program for several months because the school did not have a teacher for the anatomy class I needed to take. Making me sit out for so long was very disruptive for my education.

14. Another reason my classes at RSHT did not facilitate student learning was that RSHT routinely assigned students to classes out of the proper sequence. For example, even though the concepts in "Anatomy & Physiology II" built on the concepts in "Anatomy & Physiology I," I was placed in the Anatomy & Physiology II class first. This created a very difficult learning environment.

15. As a result, I sought extra help to compensate for not learning the course material in the proper order. When I asked RSHT for the tutoring promised to me when I signed up, I was told that tutoring would only be available during regular business hours and that I was out of luck because I worked during the day.

16. Textbooks were also a major problem. Books were included in tuition, but often we didn't receive our textbooks for a class until after the class had already started. The books also contained inaccurate information.

17. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

18. RSHT also failed to give me appropriate clinical experience. When I arrived at the hospital I was assigned to for my clinical hours, I did not feel that RSHT had adequately prepared me. I did not know how to do many basic procedures that I should have been prepared by RSHT to perform.

19. There was also not enough supervision on my clinical hours, so they would rotate among students and force one student to sit out each week.

20. Because of the poor quality of education I was receiving at RSHT, I withdrew from the school in May 2011.

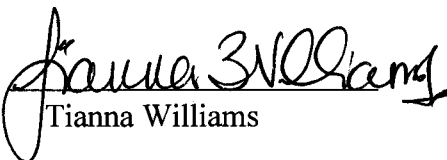
21. Instead of working as an LPN, I work at a hotel.

22. My loans have not yet entered repayment, but I am not sure how I will pay them when they come due if I am not able to defer repayment.

23. I am African-American. The majority of my classmates at RSHT were African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and African-American people.

24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: 
Tianna Williams

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF DELORES WOODY

I, Delores Woody, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2010 until 2011. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Community Home Health program at the Richmond campus. I completed and graduated from the program.
3. I left RSHT with about \$5,000.00 in federal student loans that I cannot afford. I also had to pay \$40.00 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in community home health.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to community home health.

7. They also told me that if I attended and graduated from RSHT, I was guaranteed a job in my field of study. They told me that I would earn enough money to cover the cost of any loans I was taking out, and to not worry about the cost of attending the program. They also told me that RSHT's career services office would give me extensive assistance in finding a job.

8. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. I learned a few weeks into the CHH program that there is no such thing as certification in "community home health" in Virginia and that RSHT did not know what

certification examination I and the other CHH students would take. Due to student complaints, the school enrolled us in a six-week Certified Nurse Aide Training Program at another school, the Professional Career Institute ("PCI"). It cost RSHT less than \$1000 to enroll me in that program, but RSHT did not refund any of the more than \$10,000 I had paid for the CHH program.

12. Another problem with RSHT was inadequate classroom space. CHH did not have its own classroom so we would have to share space with the other programs. This created a very difficult learning environment.

13. RSHT also failed to give me an appropriate externship. For my externship, I spent six weeks at a nursing agency called Heaven Sent. Instead of gaining hands-on experience in home health care, I spent most of my time observing the on-staff nurses. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

14. Another problem with my externship was that Heaven Sent is located in Colonial Heights, Virginia, which is about a forty-five-minute drive from my home. Completing the externship also required additional driving to the homes of Heaven Sent's clients. I did not have a car at the time so I had to borrow friends' cars in order to get to the externship site, which caused a great deal of stress. The school had not told me that the externship would be so far away. If I knew the externship would be outside of Richmond I would not have enrolled. The distance and additional expense of the externship was a big hardship for me.

15. I have tried very hard to get a job as a home health care professional since graduating from RSHT, but I have been unsuccessful.

16. I know very few people from RSHT who have found jobs in their field of study.

17. RSHT's career services office has given me no help in finding a job. The only thing the career services office has done is review my resume.

18. Instead of working as a home health care professional, I am unemployed.

19. My student loans have not yet entered repayment. I do not know how I am going to make the payments when the six-month post-graduation grace period is over.

20. I am African-American. The majority of students at RSHT are African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

21. I have suffered great personal anguish as a result of RSHT's broken promises. As a woman in my fifties trying to turn my life around, the fact that I am still on food stamps and cannot pay my bills has caused me great hardship and stress. I have suffered panic attacks because of my inability to find work as RSHT had promised.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20 2011

BY: 
DELORES WOODY

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, *et al.*,

on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH
AND TECHNOLOGY, INC.,

Defendant.

No. 1:11-cv-01066-GK

DECLARATION OF BRENDA DREW

I, Brenda Drew, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee at the Richmond campus of RSHT, a school that is also known as "Richmond School of Health and Technology." I am African-American, as was the vast majority of the student population at the Richmond campus.

2. I hold a Doctorate in Education from the University of Virginia and have decades of experience working in the field of education. Among other positions, I have served as a high school principal in Richmond and am currently a consultant to Virginia Union University, an historically Black College and University (HBCU) in Richmond.

3. I was the Academic Dean of RSHT's Richmond campus. I interviewed for the position with Maxine Stine and Melanie Chewning. Maxine Stein was the Director of Education



for RSHT and worked at the corporate office. Melanie Chewning was the Director of the Richmond campus.

4. I began work at RSHT in May 2010. I resigned voluntarily in September 2010. I left because I felt that RSHT was not providing a remotely adequate education to its students, that the school was doing a great disservice to its students, that the senior staff at the school was not interested in improving its educational programs, and that the school's sole purpose was to earn money. I did not want to be a part of this. I also left because senior staff treated most employees and students, including myself, very poorly and unprofessionally.

5. I spent my first week as an RSHT employee in training. The training consisted primarily of reviewing the school's curriculum guide, which Ms. Stine had developed, and other RSHT handbooks. I was surprised to find that the curriculum guide contained very little information about the content and goals of the school's educational programs. Based on my many years of experience in education, I know that a curriculum guide should set forth in considerable detail information about what students are supposed to learn in each class and program. RSHT's curriculum guide did not.

6. There were many ways in which RSHT failed to provide the education its students deserved, some of which I describe here.

7. One of the biggest reasons that the education provided by the school was poor was that the school did not provide any support to help instructors develop their teaching skills. This kind of support was badly needed at RSHT because RSHT hired many instructors without any significant teaching experience. For example, the school would hire instructors in Surgical Technology and Pharmacy Technology who had not taught before. Even with the best intentions, instructors without teaching experience and teaching skills typically are not effective

in the classroom. Given its hiring practices, RSHT should have provided regular staff development opportunities for its instructors. The students suffered educationally because the school did not provide these opportunities.

8. RSHT also failed to offer students the kind of broad developmental support that they needed, such as mentoring and tutoring. The vast majority of the students at RSHT were from educationally and socioeconomically disadvantaged backgrounds. They did not have the skills, knowledge, and habits needed for success in higher education or in skilled professions. This was apparent to me as soon as I started working at RSHT. I believe it was RSHT's goal to attract students like this because the students' inexperience and lack of sophistication made it easier to persuade them to enroll. Senior employees must have been aware, like I was, that the vast majority of RSHT's students did not understand how to succeed in higher education or skilled professions. Many of these students had been out of contact with educational institutions for a long period of time. Because RSHT relied on such students to fill the school and to make money, the school was obligated to give the students the developmental support they needed to learn how to succeed in school and work. The school made no effort to provide this support, however, and the students were left to struggle without the assistance that RSHT should have given them.

9. Another way in which RSHT failed its students was by simply neglecting to assign teachers to classes. The Surgical Technology students, for example, went six weeks (an entire mod) without a qualified surgical technology teacher after one teacher was fired. Instead of finding a new teacher, RSHT arranged for a former Dean named Mark Russell to cover the class. Mr. Russell was not qualified to teach the course and did not try to teach it. Instead, he

would play a video at the beginning of class and then tell the students to leave well before the class was scheduled to end.

10. RSHT's decision to assign Mr. Russell to the class was consistent with its practice of assigning administrative staff as substitute teachers instead of people who were qualified to teach the particular course. I and other administrators were frequently required to act as substitute teachers in classes that we were not qualified to teach because the assigned instructors were often absent. I objected to Ms. Chewning about this practice because I felt it was detrimental to the students, but the practice was not changed.

11. One of the things I learned by substituting was that the students in any given class typically were working from different editions of the textbook. This makes it very difficult for even an experienced and competent instructor to teach a class effectively. RSHT was responsible for this problem because RSHT purchased and distributed the textbooks using the students' tuition dollars.

12. RSHT also failed to provide adequate supplies and equipment for laboratory classes. The laboratory classes are very important because RSHT's programs involve healthcare fields. Students are supposed to get hands-on clinical training in these classes so that they learn how to work with the supplies and equipment that are used regularly in the fields they are preparing to enter. RSHT's failure to provide these materials prevented students from learning important practical clinical skills, including very basic skills that give them the practical experience they need.

13. Similarly, the school did not have nearly enough computers for the computer course that students were required to take.

14. RSHT also failed to provide appropriate externships for its students. This was a very significant problem in all of the programs, but it was especially important for the Surgical Technology students because they cannot become certified without sufficient operating room experience. They are supposed to gain this experience through their externships which are required for certification. These externships involve a large number of required operating room cases. During the time I worked at RSHT, the only place surgical technology students were sent was to a "central sterile" externship, where they merely clean and prepare instruments. They do not gain any practical operating room experience at all in central sterile. Hospitals and other healthcare facilities did not want RSHT students in their operating rooms because the school's reputation was so bad.

15. I told Ms. Chewning about this problem but she did not care, even though she was the highest ranking employee at the Richmond campus and the lack of proper externships prevents graduates from becoming certified as surgical technologists. She told me that it was somebody else's job to worry about finding externships for students, not hers.

16. RSHT's Community Home Health ("CHH") program was a debacle that served to enrich the school at the expense of its students. The program's curriculum was not aligned with any credential. The students began asking Ms. Chewning lots of questions when they realized that they were not going to earn any credential, but Ms. Chewning ignored them. In the end – and only after more than a dozen students complained to the State Council of Higher Education for Virginia – RSHT sent the CHH students to a short Certified Nursing Assistant program at another school. That only made them eligible for the low-level CNA credential, however, even though the students paid RSHT over \$10,000 each for the CHH program. The students could

have become eligible for this credential for a small fraction of the cost and time they spent at RSHT if they had gone somewhere else instead of RSHT.

17. The CHH externships were also inadequate. The only externship the school could find for the CHH students was with a nursing agency in Petersburg. Even then, the facility would only permit the students to "shadow" its employees and would not let them do any hands-on work. This made the externships of very little value. In addition, setting up externships in Petersburg placed a great hardship on the CHH students, many of whom did not have cars and/or could not afford the gas to drive back and forth between Richmond and Petersburg every day.

18. Another problem at RSHT was the way the school handled things when students were behind on the out-of-pocket payments that they had make to the school every month. These payments were typically \$40 and covered the portion of tuition that student loans did not. A financial aid staffer would come to the classroom door with a list of students who were behind and call out their names. Students who were behind by a month or more generally were not permitted to continue coming to class until they were caught up. This interfered substantially with students' academic progress, even though only a very small portion of students' tuition was involved. Moreover, the public way in which the school did this was embarrassing and entirely unnecessary.

19. RSHT also changed students' grades. Senior administrators would change the grades of students who were failing into passing grades. This allowed RSHT to continue to earn money from the students because it kept the students from failing out of the school. I remember notifying Ms. Chewning about one student who was receiving an F because of poor attendance, and learning later that the student had instead received a passing grade. I know that senior administrators, including Ms. Chewning, changed failing grades of students to passing grades.



20. I remember another incident in which RSHT used a different kind of dishonest tactic to increase the money it was making off of a student. The student had once been enrolled in RSHT's nursing program and had taken and passed four general education classes. When she later reenrolled at RSHT in the Medical Assisting program, Ms. Chewning said that she had to retake the very same general education classes. In other words, RSHT refused to honor its own credits, which allowed it to charge the student more money for the Medical Assisting program than was justified. I told Ms. Chewning that this made no sense and was improper, but she refused to change her mind.

21. I believe RSHT intentionally recruited African-American and low-income students because it believed it could take advantage of their limited experience and sophistication with respect to post-high school education. RSHT recruiters and administrators knew that they could make a lot of money in the African American community because they could find underprivileged students in this community who would qualify for the government loans that RSHT needed to be profitable. Recruiters were put under pressure to find as many new students as they could. They had quotas that they had to meet. Students were recruited for the Richmond campus from low income housing projects located in the African American community. The Richmond campus is located on the "bus line," which was highly accessible to the African American areas of Richmond. I believe the school's location on the bus line makes it easy for it to target the African American community.

22. Melanie Chewning met with the recruiters every week to make sure they were getting as many new students as possible. Even though she was my supervisor and accountable for the instructional program, she met with me and her staff far less frequently than the recruiters.

23. I know that the advertisements for RSHT appeared on TV at the same time as the Montel Williams Show.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: September 27, 2011.

BY: 
Brenda Drew

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN, *et al.*,

on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH
AND TECHNOLOGY, INC.,

Defendant.

No. 1:11-cv-01066-GK

ADDENDUM DECLARATION OF CATHLEEN A. FREIBURGER

I, Cathleen A. Freiburger, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. On September 27, 2011, I provided a declaration in the above case.
2. About a week later, I spoke with Deanna Cosner, a former coworker of mine while I was employed at RSHT. After that conversation, I realized that my declaration contained an inaccuracy. Paragraph 13 of the declaration states that Deanna had told me that she saw Stacy Ruiz, a financial aid officer at RSHT, falsify student loan applications by forging names and signatures. I realize after talking with Deanna that I confused Stacy Ruiz with Tammy Raines. Deanna told me that she had seen Tammy Raines, Stacy's supervisor, forging signatures on student loan applications while she was sitting at Stacy's desk, not Stacy Ruiz.

CAF

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: October 7, 2011.

BY: Cathleen A. Freiburger
Cathleen A. Freiburger

COZ

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN, *et al.*,

on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH
AND TECHNOLOGY, INC.,

Defendant.

No. 1:11-cv-01066-GK

ADDENDUM DECLARATION OF CATHLEEN A. FREIBURGER

I, Cathleen A. Freiburger, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

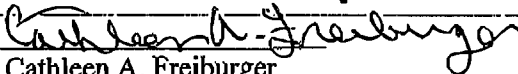
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Caf

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: October 7, 2011.

BY:


Cathleen A. Freiburger

COZ

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, *et al.*,

on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH
AND TECHNOLOGY, INC.,

Defendant.

No. 1:11-cv-01066-GK

DECLARATION OF CATHLEEN A. FREIBURGER

I, Cathleen A. Freiburger, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee at the Chester campus of RSHT, a school that is also known as "Richmond School of Health and Technology." Even though the Chester campus is situated in a majority white area, the student body is majority African-American.

2. I was hired as Career Services Placement Coordinator for the Chester campus in April 2010. I was hired to work with students to place them in externships and help them find permanent jobs.

3. I only stayed at RSHT until December 2010, when I left voluntarily. I left because senior RSHT employees falsified records and wanted me to falsify records as well. I also left because I felt like RSHT was ruining its students' lives by saddling them with

tremendous debts while failing to fulfill its promises to prepare them for good careers and jobs that paid well. I did not want to be a part of this.

4. On my very first day at RSHT, I was very surprised when Sandra Kerrick, the school director, handed me a textbook and told me that I would be teaching the Career Development course. I was not trained to teach from this textbook or to teach this course. I was supposed to teach the students at the end of their time at the school, when they were finished with their curriculum. I wound up teaching this course to students from the Medical Assisting, Pharmacy Technician, and Community Home Health programs. But the students were not well served, because the textbook was not the right one for this course.

5. Finding appropriate externships for students was very difficult and I believe the school failed to live up to its promises and obligations to the students to place them in appropriate externships. A major reason for this is that many healthcare facilities in the area will not accept RSHT students as externs. They refuse because they have taken RSHT students as externs before and had bad experiences. The students were poor externs because they had not learned nearly enough at RSHT and were extremely unprepared to work in a real healthcare setting with responsibilities for real patients. I spoke with staff at some of these facilities and they told me that they were shocked at how little RSHT students knew and how unprepared they were.

6. For much of the time that I was at RSHT, there was only one facility for which we could place Surgical Technology students who studied at the Richmond campus. That facility was Henrico Doctors' Hospital. Henrico, however, would generally only let us place students in its central sterilization division (also known as "central sterile"), not in the operating room. This was not an adequate placement because Surgical Technology students must participate in a

minimum number of surgical procedures to become certified after graduation from RSHT. Time in central sterile does not count toward this requirement. To the best of my understanding, students without enough procedures cannot sit for the National Board of Surgical Technology and Surgical Assisting's written examination. As a direct result, many students were ineligible for certification even though they graduated from RSHT. Furthermore, central sterile fails to provide students with the kind of hands on surgical experience they need to help them find and succeed in surgical technology jobs after graduating.

7. Another way in which RSHT prevented students from having a worthwhile externship experience was by failing to tell them before they enrolled that most externship sites were only accessible by car. This was very important because many students did not have a car or could not afford to buy the gas needed to drive to and from an externship site every day. As a result, many students not only were denied what should have been valuable real world experience as an extern, but they were also ineligible to graduate because satisfactory fulfillment of RSHT's externship requirement is needed to graduate.

8. In the end, few students had appropriate and educationally beneficial externship experiences. Senior RSHT personnel knew about these problems because I told them. I do not think I was the first to raise these problems with senior staff. RSHT nonetheless continued to enroll as many students as it could, even though it knew that it did not have the ability to meet their educational needs.

9. I knew that RSHT senior administrators knew about this problem because the forms that students filled out in which they talked about their experience at the school year after year made clear that they had been unable to get externship experience.

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10. One of my responsibilities was to certify that students had completed the externship requirement. But because of the problems described above, among others, many students did not. Nonetheless, I was instructed by my superiors at RSHT to include false documentation in students' files saying that they had completed their externship. Sandra Kerrick told me to do this. She told me: "you will do whatever needs to be done," and that "you will not fail these kiddies." By this, Ms. Kerrick meant that RSHT did not care if the students got jobs or could pay their loans, but only that we needed to keep the students in the school so RSHT could get the government loans that made the school profitable. I refused to falsify records even though that is what I was told to do.

11. In addition to the externship problems, RSHT students also did poorly in finding jobs in their field of study. The school tried to hide its poor record in job placement by falsifying records, including records that were subject to audit. This included documents called "Graduate Status Form" and "Graduate Employment and Evaluation Questionnaire." These forms ask graduates about their current employment status and their opinion of RSHT. I saw the School Director, Debra Harris, forge both substantive answers and signatures on these forms. I was instructed that I was not to let people say anything bad about RSHT when they filled out these forms. Many people did say bad things about RSHT on these forms, however, and the school would destroy those forms. I did not participate in destroying responses that the school was unhappy with.

12. Another dishonest practice at RSHT was to change students' grades. I learned that senior administrators would change the grades of students who were failing into passing grades. This allowed RSHT to continue to earn money from the students because it kept the students from failing out of the school.

13. Deanna Cosner, who was the Registrar at the Chester campus, told me that she personally saw Stacy Ruiz falsify student loan applications by forging names and signatures on the applications. Stacy Ruiz was a financial aide who worked at the Chester campus. Deanna and Stacy shared an office so Deanna could see what Stacy was doing. These were loan applications that were to be sent to the federal government to qualify RSHT to receive federal student loan funding.

14. RSHT was also dishonest in how it dealt with students on the front end, when the school was trying to persuade them to enroll in the first place. One of the school's marketing techniques was to hold "open houses" on campus. Administrators and teachers were required to attend these events and give a short speech saying that RSHT was a wonderful school, that its students received a top education, and that enrolling would open up opportunities for good, well-paying jobs in good careers. Speakers strongly implied that students would have no difficulty finding a good job after graduating. Speakers also told students that externships would be available at night when they knew that was not true for all the programs. The message that the school sought to communicate was that "RSHT will make your dreams come true." Much of the information conveyed to prospective students at these events to entice them to enroll was false. Through open houses and RSHT's other communications with prospective students, the school sought to take advantage of less sophisticated people who lacked the experience to see through the school's slick sales pitch.

15. RSHT's single-minded concern with making money at the expense of what was good for its students was also evident in how little regard it had for prospective students' specific career goals and interests. If people expressed interest in a particular program but there were no

openings in that program at the moment, admissions personnel would use high pressure tactics to persuade them to enroll in a different program instead of waiting for the program they wanted.

16. RSHT's Community Home Health program demonstrates the school's disregard for its students' best interests. Students paid over \$10,000 for the program, but the school failed to align the program's curriculum with any credential offered by a state or independent body. RSHT wound up paying less than \$1,000 per student to enroll the Community Home Health students in a Certified Nurse Aide program at another school so that the students would be eligible for a credential, even a low-level one. The students wound up paying more than \$10,000 for an education worth less than \$1,000, but RSHT kept the difference.

17. I also believe that the school had an obligation, which it did not live up to, to help its students understand more about the significant financial responsibilities they were assuming to attend RSHT. It was clear that most of the students at RSHT had little experience with and understanding of money management and debt, yet the school aggressively pushed them into taking out large federal student loans. Instead of helping the students understand what they were doing financially, I believe the school took advantage of its students' lack of financial sophistication. The school did this for its own financial gain and at the expense of both its students and the federal government, which supplied the funds necessary for RSHT to exist and make money.

18. I believe RSHT targeted African American and minority communities in particular because they thought individuals in these communities would be easier to recruit for their fraudulent programs. This was clear to me from the advertising that the school did, and from what I saw about how the school went about recruiting students, and where admissions employees went to recruit students. I also know this because I heard the sales pitch that the

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recruiters made to prospective students in these communities. It was like listening to a used car sales person sell a product that was a lemon to an unsuspecting and trusting customer desperate to have a car.

19. RSHT put information on its website that it knew was not true. For example, RSHT advertised that it was an approved testing site for Pharmacy Technician and Community Home Health. This was not true. I told senior administrators that they should take this off the website but they did not.

20. One of the dishonest practices that caused me to leave RSHT in December of 2010 was the pressure I was put under to modify and falsify records for an upcoming audit. The school director Debbie Harris wanted me and others to change records to make it appear that RSHT had more graduates placed in jobs than it did. I refused to do this. I learned that the directive to change these records had come from Carolyn Lake in the front office. These records went back to 2009. I left the company rather than participate in what I thought was an unethical and fraudulent practice.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: September 27, 2011.

BY: Cathleen A. Freiburger
Cathleen A. Freiburger

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, *et al.*,

on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH
AND TECHNOLOGY, INC.,

Defendant.

No. 1:11-cv-01066-GK

DECLARATION OF DEANNA COSNER

I, Deanna Cosner, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee at RSHT, a school that is also known as "Richmond School of Health and Technology."

2. I worked as the Registrar of the Chester campus from April 2010 until April 2011, when I left voluntarily. I left because I felt that the school was taking advantage of disadvantaged students by saddling them with tremendous debts while failing to fulfill its promises to give them a good education and open up opportunities for good careers and jobs that paid well. I also left because school employees, including senior staff, regularly engaged in dishonest practices. I did not want to be a part of this.


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3. As the Registrar, I was responsible for all of the students' academic files. These files contained or were supposed to contain, among other things, each student's grades, attendance records, and high school transcript or GED certificate. Most of these records were kept on paper, but some were kept by computer.

4. One of my responsibilities was to send transcript request forms out to the high schools that new RSHT students had attended. RSHT was supposed to have proof of high school graduation or a GED certificate in its files within five weeks of when the student started classes. My understanding is that this was a governmental regulatory requirement.

5. Many high school transcripts and GED certificates were missing from the files when I started working at RSHT. In some cases, a transcript request form had been signed by the student but never sent. In other cases, the file did not even include a signed request form.

6. Sandra Kerrick and Debbie Harris were very concerned about the missing transcripts and GED certificates because an accreditation audit was coming up. Ms. Kerrick was the Academic Dean for the Chester campus and Ms. Harris was the School Director for the Chester campus. I believe they sent the old request forms in to the high school or state board in the case of a GED and forged students' signatures on new forms, which they also sent in. When responses came back by fax, they covered up the date on the fax transmission line and recopied the documents. I know this because the high school transcripts that we received looked different from the ones we had. They put the new documents in the students' files so it looked like RSHT had followed proper procedures and requested and obtained the documents in a timely manner. I saw Sandra Kerrick and Debbie Harris put white out on the fax transmission line and forge the seal on these documents. They then asked me to back date the documents.

7. These were not the only records that RSHT handled in a dishonest way. The school had to maintain attendance records, and show adequate attendance, for regulatory purposes. I was responsible for picking up the daily attendance sheets from each class every day. Ms. Kerrick regularly told me to mark students as "P" (for "present") even though I knew they had been absent and the students told me they had been absent.

8. Similarly, I remember identifying two students from before I began working at RSHT whose files did not contain any information about attendance. When I came back early from lunch one day, I saw another employee entering Ps in the grade book and computer database for the students. The employee later said that the attendance information had been there all along and that I must have just missed it.

9. I sometimes identified other records that were missing from the files, only to later find them set up to look as if they had been in the files all along. I often noticed these changes right after a weekend.

10. RSHT also forged records about whether graduates had obtained jobs in their field of study. The school had to maintain and report this information for regulatory purposes. I believe that senior staff would come in over the weekend and sign students' names on forms saying that they were working in their field of study.

11. RSHT also changed students' grades from failing to passing. I was familiar with this because I was responsible for receiving grades from instructors and entering them. I also had to notify Ms. Kerrick, the Academic Dean, when Ds and Fs were submitted by instructors. I remember one time when six students were given Fs in the Anatomy and Physiology class. I reported this to Ms. Kerrick, and then found that four of the six Fs were changed to Cs by the end of the day. I saw grades changed like this regularly. This allowed the students to continue their

enrollment at RSHT, which allowed RSHT to continue collecting their federal financial aid dollars.

12. RSHT engaged in similar practices with respect to financial aid forms. I saw Tammy Raines cut students' signatures out of documents in students' files and paste them onto financial aid forms that were submitted to the federal government. Ms. Raines is an RSHT employee and is the sister of RSHT's founder, Margaret Knight. I also saw a student's parent's 2007 tax return that was made to look like a 2009 return by changing the "7" into a "9." I believe Stacy Ruiz, the financial aid officer, saw Tammy Raines cutting out the signatures. Later, Stacy showed me a box of documents and forms that had signatures cut out. Stacy held up some of the documents with signatures cut out to show me. I never saw Stacy Ruiz cutting out signatures or forging documents. Stacy told me that she was very concerned about the practices she saw going on.

13. Prior to audits, I would be asked to get signatures from students for forms that were missing signatures. If I could not get a signature, I believe that Tammy Raines and others forged signatures on these documents for purposes of the audit. I could tell this by looking at the signatures. On one occasion I recognized Joyce Whitehurst's handwriting on one of the supposed student's signatures. I confronted her about this and she said: "you gotta sign what you gotta sign." I also know that some students were taken out of the school database prior to an audit.

14. Similarly, Ms. Harris once asked me to mark a document as "received" on a particular date even though we both knew that it had not been received on that date.

15. I was present once when Maxine Stine, the Director of Education from RSHT's corporate office, accused Ms. Harris of engaging in fraud. I was asked to leave before they discussed the matter in detail.

16. I sometimes cried because all the dishonest things going on around me at RSHT made me scared. I felt threatened not to talk about these things. In the summer of 2010, Ms. Harris said a news channel was doing an expose on proprietary colleges and that we should keep our mouths shut if we valued our jobs. I always felt like my job was at risk if I spoke up about the dishonest practices at RSHT.

17. There were many problems at RSHT in addition to these kinds of dishonest practices. One was that the school often did not assign qualified teachers for classes. For example, Ms. Kerrick taught a Medical Assisting class even though her degree was in physical education.

18. The Community Home Health program was simply a mess. Well into the program the students learned that the program had not been set up to lead to any credential and that RSHT was going to send them to another school to take a short Certified Nursing Assistant class. The students were extremely upset because they could have just enrolled in a CNA class to begin with and saved a huge amount of time and money. I believe that senior administrators knew about the credential problem long before they told the students.

19. The overall quality of the education at RSHT was so poor that many students who got good grades could not pass the certification or licensing examinations offered by independent or governmental entities. Admissions staff regularly told prospective students that RSHT would prepare them to pass these exams, but it was not true.

20. RSHT specifically targeted low-income people for enrollment. Financial aid officers asked prospective students if they received food stamps or assistance under other anti-poverty programs. People who received such assistance were more desirable because it meant they were eligible for more financial aid. Targeting people from socioeconomically disadvantaged backgrounds also allowed RSHT to take advantage of their inexperience and lack of sophistication with respect to higher education and debt. RSHT preyed upon these people.

21. The school's targeting of low-income people was reflected in its disproportionately high number of African-American students.

22. I have contacted the State Council on Higher Education for Virginia to explain my concerns about RSHT. I do not think the school should be allowed to continue to operate the way it has or to victimize more students.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: October 4, 2011.

BY: 
Deanna Cosner

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN, *et al.*,

on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH
AND TECHNOLOGY, INC.,

Defendant.

No. 1:11-cv-01066-GK

DECLARATION OF RENEA P. BURKE

I, Renea P. Burke, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee at RSHT, a school that is also known as "Richmond School of Health and Technology."

2. I worked as the Bursar of the Chester campus from July 2010 until May 2011. My job primarily involved collecting tuition payments from students, but I also helped with administrative duties like answering the phone at the front desk and depositing checks.

3. I felt that my supervisors and the work environment at RSHT were very unethical. My superiors repeatedly asked me to do tasks that made me uncomfortable.

4. For example, my supervisor, Debbie Harris, told me that I needed to obtain monthly tuition payments from students in any manner possible, even if it meant disrupting

students in class, harassing them with phone calls to their homes, or repeatedly calling them into my office for meetings. These monthly out-of-pocket tuition payments started at \$40, but they varied from student to student.

5. Occasionally, I would receive a notice advising me that a particular student's monthly payments had gone up for no apparent reason. Students complained about these increases to me.

6. One time, a student who had already graduated came to me and asked why she was being charged for a \$40 payment that she had already made. She showed me the receipt from that payment. When I consulted one of the accountants in the corporate office, I realized that he had recorded this student's social security number incorrectly and had credited her payment to the wrong account. This inconsistency and poor record-keeping was typical at RSHT. If that student had not paid close attention to her records and maintained her receipts, RSHT would have overcharged her.

7. My superiors at RSHT, including Stephanie Fuina in the corporate office, also told me that I was not allowed to show students their tuition payment statements. Often students would ask to see their statements for tax purposes. On several occasions, I checked in with Ms. Fuina to see if I could make an exception and show a student his or her statement, but Ms. Fuina always said no. I think RSHT prohibited students from seeing their tuition payment statements, because it did not want them to know how much they were paying to attend RSHT.

8. One time, I was in a meeting with Ms. Harris and a student who was behind on her payments. Ms. Harris told the student that she should collect and sell aluminum cans if that's what it would take for her to make her payments. Ms. Harris said that other students had done that in the past, at her request.



9. Ms. Harris also once suggested to me that I should inform female African American students with weaves or braids that they should stop getting their hair done so that they could afford to make their monthly payments to RSHT. I felt that this was a racially charged statement, because I thought it was odd that she was focusing on African-American women's hair styles.

10. In general, these sorts of suggestions seemed callous and unethical. I believe that most of the students who were struggling with monthly payments should not have been recruited by RSHT in the first place. RSHT went out of its way to recruit low-income students in primarily African-American neighborhoods even though recruiters knew that these students would struggle with loan and tuition payments.

11. I know this because whenever I answered calls at the front desk from prospective students, I would ask them how they heard about RSHT. A large number of callers said they saw a sign about RSHT in the Petersburg Social Services Office. It is my belief that Petersburg is a predominantly African-American and low-income community.

12. Targeting people in this community helped RSHT receive federal financial aid because low-income people at the Social Services Office who received government subsidies were more likely to qualify for federal financial aid. Targeting people from socioeconomically disadvantaged backgrounds and particularly African Americans also allowed RSHT to take advantage of their inexperience and lack of sophistication with respect to higher education and debt. RSHT preyed upon these people.

13. While working at RSHT, I also noticed that the programs at the school were very weak. Students never had enough textbooks or medical supplies. Some students were forced to come to the front office copy machine and copy other students' textbooks. The turnover rate for

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teachers was high. Often times, students would go for long periods in a class without a teacher while they waited for a new instructor to be assigned to teach the course. Students who graduate from RSHT have an extremely difficult time finding jobs.

14. In May of 2011, I finally expressed to my superiors that I was uncomfortable with a lot of the things they asked me to do. I was fired during that same meeting. I am convinced that RSHT terminated me because I was unwilling to go to extreme measures to collect out-of-pocket payments from students, and as a result, I did not bring in as much money to RSHT as they would have liked.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: October 31, 2011.

BY: Renea P. Burke
Renea P. Burke

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, *et al.*,

on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH
AND TECHNOLOGY, INC.,

Defendant.

No. 1:11-cv-01066-GK

DECLARATION OF SELENA R. HIGGINS

I, Selena R. Higgins, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee of RSHT, a school that is also known as "Richmond School of Health and Technology." I was the main instructor for the Community Home Health ("CHH") program at the Richmond campus from January 2010 through May 2011. I left voluntarily when the last of my CHH students finished the program.

2. I have been a Registered Nurse since approximately February 2011. I was a Licensed Practical Nurse for approximately twenty years before becoming a Registered Nurse. I have worked as a nurse in a variety of healthcare settings over the last twenty years.



3. I interviewed for my job at RSHT with Mark Russell, who was the Dean of Allied Health at the Richmond campus. Allied Health encompassed all of the programs offered at the Richmond campus except for the Practical Nursing program.

4. RSHT was about to begin its 35-week CHH program when I interviewed and Dr. Russell was searching for an instructor for the program. Dr. Russell showed me the curriculum for the first module (classes at RSHT are divided into modules, which last five weeks). It appeared to me that the CHH program was essentially a Certified Nurse Aide ("CNA") program with a home healthcare focus, and I asked Dr. Russell if this was correct. He said it was. CNAs are licensed by Virginia through its Board of Nursing. CNAs typically provide low-level assistance in nursing homes and in patients' homes.

5. After I started teaching at RSHT I obtained a copy of the full 35-week curriculum from Melanie Chewning, who was the Director of the Richmond campus. I was very concerned when I reviewed the full curriculum, because I knew that it did not align with any certification or license. I promptly addressed this concern to Ms. Chewning and told her that without any credential, the students would be largely unemployable. I told her that even if the students could get a job as a home health aide after graduating, agencies that hire aides without the CNA credential typically pay only minimum wage and do not provide benefits. Ms. Chewning eventually told me to talk to Maxine Stine about this. Ms. Stine was the Director of Education for all of RSHT and worked at the corporate office.

6. I met with Ms. Stine and told her that the CHH program is really a CNA program and needed to have a credential attached to it so that the students could find jobs after graduating. I did not know at the time that RSHT had previously offered a CNA program (technically, a

“nurse aide education program”) that was approved by the Virginia Board of Nursing, but that the Board had rescinded its approval in 2005.

7. Ms. Stine replied that the CHH program was a “Home Health” program, not a CNA program. There is no such thing as a “Home Health” credential in Virginia, however. I told Ms. Stine that whatever she called the program, the people who perform the tasks from the CHH curriculum in patients’ homes are typically CNAs. I also told her that the program was not going to work as it was designed. Ms. Stine was very defensive about the CHH program and refused to acknowledge any problems with it.

8. I repeatedly complained to Ms. Chewning that the CHH program was fundamentally flawed because the students would not be eligible for any credential. At one point I suggested just turning it into an official CNA program. Ms. Chewning replied that the school had a CNA program once before and could not “go that route,” or words to that effect.

9. My complaints to Ms. Chewning and Ms. Stine continued over the course of many months. Ms. Chewning told me that she explained my concern about the CHH program to RSHT’s CEO, Carolyn Lake, but I never had the opportunity to speak to Ms. Lake about it directly. All this time, RSHT was enrolling more students in the CHH program.

10. My concern that the CHH program was deeply flawed because it would not lead to some kind of recognized credential was confirmed by area healthcare employers. RSHT had what it called an “advisory board,” which consisted of healthcare providers from various facilities in the area. They would come to the school periodically and RSHT would promote its programs at these meetings. I knew some of the advisory board members from my many years in nursing.



11. I expressed to my RSHT supervisors that we should cancel the advisory board meeting because the CHH program was not right and we should not be promoting it. I was overruled by Calvin Brown, the head of career development at the RSHT Richmond campus.

12. The advisory board members said they would not be able to hire graduates of the CHH program if they did not earn a relevant certification. They also said they could not help provide externship opportunities for the CHH students because graduates of the program were not eligible for any certification.

13. The CHH students eventually learned that the program was not set up to lead to any certification. They were extremely upset. The students told me that when RSHT was trying to get them to enroll, the school told them that they would earn a credential in home healthcare and that they would be able to earn much more than minimum wage. Students were also told that completing the CHH program would allow them to do a variety of other things, including opening their own home health businesses and working for home health agencies. The students sent letters of complaint to Ms. Chewning and to the State Council of Higher Education of Virginia, a state agency. I went to a meeting that one student arranged with Ms. Chewning, who said that she was unaware of the credential issue. By that point I had been telling her about it for months and the students had sent her letters about it. Ms. Chewning claimed that she had never received the letters. I know this was not true, because I was the one who delivered the letters to her.

14. After the students sent their complaints to the state and close to when most of the students were going to finish the CHH program, RSHT decided that the students should sit for the Patient Care Technician ("PCT") examination. This exam is given by the National Center for Competency Testing, an independent non-governmental agency that offers several medical

certifications. I reviewed the PCT materials and it was apparent to me that the CHH curriculum was not aligned with the PCT exam, and that the CHH students would therefore not do well on it. I advised the students against taking the PCT exam, because I knew that the CHH curriculum had not prepared them for it. The students who took the PCT exam did not pass.

15. RSHT's next attempt to address the credential problem was to send the CHH students to a CNA course at a different for-profit school in Richmond, the Professional Career Institute ("PCI"). This was a six-week course and cost less than \$1,000. RSHT paid this cost, but did not pay the CHH students back any of the more than \$10,000 they had each paid to attend RSHT. RSHT also refused to pay the fee for taking the CNA exam. I know of some students who have not been able to sit for the CNA exam, because they cannot afford the exam fee.

16. PCI is able to offer a CNA course in only six weeks, because Virginia only requires CNA programs to include 120 hours of training. RSHT's CHH classes, however, met several hours a day, four days a week, for 35 weeks.

17. One of the CHH students, Mary Morgan, told me that she had previously been a CNA. This meant that she didn't need to take any class to get her CNA license reinstated, she could just study on her own and take the examination. Ms. Morgan told me that before she enrolled at RSHT, she had told the admissions office that she had previously been a CNA.

18. The CHH program had significant flaws even beyond the credential problem. One of these was its inability to place students in appropriate externships. RSHT's reputation in the community is so bad that it is very difficult for the school to place students in externships. The only externship site that RSHT could find for the CHH students was a home health care agency near Petersburg. That agency would only take two students as externs at a time. Also, this location was very problematic because many of the CHH students did not have cars and/or

could not afford the gas money to go so far every day. Since the school advertised that it was "on the bus line," it did not make any sense to force students to go to an externship that required a car. Students told me that, before they enrolled in RSHT, they were not told they would need to drive to an externship.

19. Several students completed the CHH program but were not allowed to graduate because they were unable to complete the externship requirement. The externship requirement was for 100 hours. For CNA programs, Virginia requires only 40 hours of skills training through direct client care.

20. Another major problem with the CHH program was the lack of resources. The CHH curriculum required a certain amount of hands-on laboratory time, but RSHT did not give the students sufficient access to the lab to come close to meeting that requirement. Even when RSHT would schedule times for the students to go to the lab, the lab was very often not available during those times. Time in the lab is important because it allows students to get hands-on clinical training with the supplies and equipment they will need to use when they finish school and are working. RSHT's failure to provide enough lab time prevented students from practicing and adequately developing important clinical skills, including very basic skills.

21. The vast majority of the students I encountered at RSHT were poor, African-American, and lived in public housing. I do not think this was by chance. To the contrary, I believe that RSHT marketed itself to attract students from educationally and socioeconomically disadvantaged backgrounds because their inexperience and lack of sophistication made it easier to persuade them to enroll.

22. Consistent with this, I learned from talking with my CHH students that they did not have a very good understanding of the federal student aid programs, even though RSHT

arranged for them to borrow large amounts of money through those programs to pay their tuition. After they told me that RSHT filled out their federal FAFSA forms, I brought in a blank FAFSA and the students did not recognize it. They told me that Jennifer from the Richmond admissions office had given them only a vague explanation of how their loans worked and told them to sign the papers that the school filled out for them.

23. Even though RSHT did not explain the financial aid forms and programs to the students, it frequently called students out of class to sign the forms. RSHT would also call students out of class to have them pay school fees. This was very disruptive and interfered with my ability to teach and students' opportunities to learn.

24. RSHT also acted unethically in other areas. For example, RSHT wanted me to teach the CHH students how to administer medications, but I refused. It would be illegal for them to administer medications without a license, and they were not going to earn the necessary license by attending the CHH program at RSHT.

25. It is my understanding that RSHT also manipulated its records about the number of graduates who were employed in their field of study, information which I understand must be maintained for regulatory purposes. If a graduate was working in an administrative or janitorial job in a hospital, for example, RSHT officials would claim that the job was in the person's field of study simply because it involved healthcare, even if the job had no other connection to what the person had studied.

26. I feel terribly for my CHH students because RSHT set up the program to take advantage of them for financial gain. I did my best for the students, but I believe they would have been better off if instead of going to RSHT, they had just taken a much shorter and much less expensive CNA class at another school.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: October 7, 2011.

BY: Selena R. Higgins
Selena R. Higgins

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, *et al.*,

on behalf of themselves and all
others similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH
AND TECHNOLOGY, INC.,**

Defendant.

No. 1:11-cv-01066-GK

DECLARATION OF STACY RUIZ

I, Stacy Ruiz, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee of RSHT, a school also known as the “Richmond School of Health and Technology.”
2. I began working as a financial aid officer at RSHT’s Chester campus in late June 2009, and I worked there until August 12, 2011. My job involved handling and processing students’ financial aid applications. Prior to working at RSHT, I was a military police officer at Fort Drum, in New York, and I later worked for about three years as a student account officer at Platt College, a private college located in California. I am familiar with financial aid documents and the procedures for receiving federal financial aid.

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3. I felt that my supervisors and the work environment at RSHT were very unethical. There was also a complete lack of consistency and professionalism at RSHT. Policies were rarely written down, and, to the extent that some policies were in writing, they often were not followed. For example, when I first began working, I would explain to students the financial information contained on their ledger cards. I was then told never to let students see this information. However, in early 2011 when RSHT learned that it would be audited, I was told that if the auditors asked, I was to say that we did in fact provide students their ledger information, even though I had been directed not to provide that information.

4. I was told not to share other financial information with students as well. For instance, I was told never to give students any disbursement notification forms we received from the federal government on their behalf. I was also told not to tell graduating students how much money they had taken out in loans. Instead, my supervisors told me to refer students to the National Student Loan Database System.

5. I also witnessed my direct supervisor, Tammy Raines, fraudulently obtain student signatures on financial aid documents by cutting and pasting signatures and having students sign blank forms. These documents included Institutional Student Information Record ("ISIR") correction forms and loan change forms. ISIR correction forms are used to correct students' financial aid information on file with the federal government. Loan change forms can be used to request additional loan amounts from the federal government. Anytime either form is submitted to the federal government, it is required to have the particular student's signature on the form.

6. I was told by Raines to have students sign blank ISIR correction forms, so that if a change to that student's financial profile needed to be made, RSHT would have a signature on

hand and would not need to contact the student. Raines also told me to have students sign blank loan change forms.

7. When Raines did not have a blank form already containing a student's signature, she would forge that student's signature by cutting and pasting the signature on to the document. She would cut out the student's signature from another form, paste that signature onto the unsigned form, and then photocopy the document with the pasted signature to make it look like an original.

8. One time, I saw Raines with scissors cutting out a signature from a student's financial aid document. I left the office, and when I returned, I saw a large box containing many documents waiting to be shredded. About thirty of those documents were ISIR change forms with holes where the signatures had been cut out. I showed Deanna Cosner, a co-worker, some of the documents with holes in them.

9. By having blank forms containing student signatures on file, or by cutting and pasting student signatures, RSHT was able to request additional loans from the federal government in students' names without the students knowing that additional loans were being taken out and without the consent of those students.

10. RSHT officials knew that I was uncomfortable with their practices, so they did not ask me to forge or change signatures. I never forged or cut and pasted signatures. I think doing something like that is unethical and wrong.

11. Other RSHT practices seemed wrong to me. For example, Raines would request the full amount of available federal subsidized and unsubsidized loans for students, even if that full amount was unnecessary given a particular student's financial profile. In such cases, the students were told that a certain amount of loans were being taken out on their behalf, but, in

fact, a higher amount of loans were actually taken out. These additional funds were taken off the ledger sheets upon the students' graduation, but I do not know whether RSHT ever returned these additional funds to the federal government. Even if the additional funds were returned to the federal government, the students were charged interest on some of the loans while they were enrolled. These additional amounts should not have been taken out in students' names, and the students never should have been charged that interest.

12. In one instance, I know that RSHT was receiving more money in federal loans and grants than was necessary for that student. The student requested to have the additional money reimbursed to her, rather than to the school. I informed the student that to receive the reimbursement, she needed to write a letter indicating that she wanted the additional funds reimbursed as stated in the RSHT student handbook, and I provided her with a federal form detailing the necessary procedure. The student later met with Debbie Harris, the School Director, who told her that RSHT would not reimburse any money to her until she graduated or withdrew from the program. I knew that withholding the money in that manner was wrong, because it was contrary to the RSHT student handbook.

13. Another time, the father of a student contacted the RSHT financial aid office. He was upset because RSHT had requested more loan money for his child than RSHT had indicated it would request when the student initially enrolled. It is my understanding that the additional money was taken out in the student's name without the student's knowledge or consent. Because the father complained, Raines sent the money back to the federal government. The father only noticed this discrepancy because he looked closely at the original loan documentation provided to his child, and then noticed that additional loans had been taken out. A student who did not pay very close attention to these documents might not have noticed such a discrepancy.

14. RSHT also had the following policy: If a student attended at least 25% of a semester, she would be charged 50% of the charges for that semester; if a student attended 50% of a semester, she would be charged 75% of the charges for that semester; and if a student attended 75% of a semester, she would be charged 100% of the charges for that semester. Sometimes, a student's federal loans would not cover the additional amounts charged for periods the student did not attend. In those cases, RSHT would sue students in court for the balance of the unpaid funds. Officials in the RSHT collections department would brag about their success rate in such actions. These officials would also harass students at home and on Facebook. I have seen former RSHT students working at low-paying jobs, such as at Sheetz, who have told me that RSHT sued them for unpaid charges.

15. I also know that RSHT officials changed students' grades, because I would hear them talking about it.

16. Many RSHT students did not understand the financial obligations they were getting into by enrolling at the school. Several students who had been enrolled at RSHT for months admitted to me that they could not read. I was amazed that RSHT had enrolled those students. Without the ability to read, those students could not review their loan documentation and almost certainly could not understand their loan obligations.

17. It was clear that many other students also did not understand their obligations. When students were about to graduate, I would conduct exit interviews with them, during which I explained loan obligations. Students would sometimes incorrectly tell me that they did not have any loans. Those students did not understand that they had taken out loans to attend RSHT. They believed that by filling out the financial forms upon enrollment and during their time at RSHT they were receiving grants, not loans.

18. It seems pretty clear to me that RSHT was targeting people of color. About 80% of the students at the Chester campus were people of color. Many students lived near each other in communities like Petersburg and Colonial Heights. Most students lived in public housing and received food stamps and other subsidies. Targeting people in these communities helped the school receive federal financial aid. Because people who lived in those communities were likely to receive government subsidies, they also would be more likely to qualify for federal financial aid.

19. While working at RSHT, I noticed that the programs at the school were very weak. The turnover rate for teachers was high. Often times, students would go for long periods in a class without a teacher while they waited for a new instructor to be assigned to teach the course.

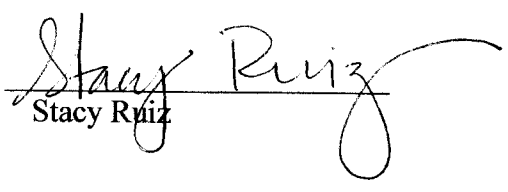
20. Students who graduate from RSHT have an extremely difficult time finding jobs. One student told me that it was a "joke" for her to have gone to RSHT, because the credential turned out to be meaningless to employers. She said that potential employers "laughed" at her.

21. Because of the unethical practices and inconsistent and unprofessional work environment, I was uncomfortable working at RSHT. Cathy Freiburger, a co-worker, questioned RSHT's practices. At first I was scared that I would be fired if I openly questioned RSHT's practices. Eventually, I decided to voice concerns with the way that RSHT was operating to Raines. Raines called me into a meeting with Harris and Carolyn Lake, the CEO of RSHT. I told them about some of my concerns, and that it felt like they were trying to find a way to get rid of me. I was fired shortly thereafter. I am convinced that RSHT terminated me because I would not participate in what I thought were unethical practices, and because I knew a lot of information about their improper conduct.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: October 31, 2011.

BY:


Stacy Ruiz

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, *et al.*,

on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH
AND TECHNOLOGY, INC.,

Defendant.

No. 1:11-cv-01066-GK

DECLARATION OF TIANA BRANCH

I, Tiana Branch, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee of RSHT, a school that is also known as "Richmond School of Health and Technology." I am African-American.

2. I was an instructor at the Richmond campus in 2005 and 2006. The classes I taught included Anatomy I and II, Medical Terminology, and Pharmacology. I taught students in the Medical Assisting and Licensed Practical Nursing ("LPN") programs.

3. I left RSHT voluntarily to continue my own education. I left RSHT because I was concerned that the school was engaged in fraudulent practices, such as falsifying loan applications and changing grades to keep failing students in school. I did not want to be connected with a place that did things like this.

4. RSHT had many significant problems and I felt that the school did not live up to its promises to give students a good education and enhance their career prospects.

5. One of RSHT's biggest problems was the lack of resources. Working medical equipment is essential for teaching clinical skills and anatomy to students, but there was never enough. For example, we did not have an adequate supply of working blood pressure cuffs or mannequins. There was a small laboratory, but most of the equipment in the lab was broken. Sometimes school officials would tell me that more equipment was on order, but it would never arrive.

6. I had to resort to showing students photographs of the equipment that they were supposed to be learning to use. This was not a remotely adequate substitute for real and functioning equipment. RSHT's failure to provide adequate equipment prevented students from learning important clinical skills, including very basic skills.

7. Another problem was that administrators regularly called students out of class to sign or re-sign financial aid forms and make monthly tuition payments. I would get a list of students and was told to have those students leave class and go to see one of the financial aid staff. This was very disruptive and interfered with my ability to teach and students' opportunities to learn. I heard that loan applications were being falsified or changed, which would mean that students had to re-sign financial aid forms.

8. Sometimes RSHT did not even assign a teacher to a class. The school would instead have one person cover multiple classes that were going on at the same time. That person would just show a video to each class instead of teaching anything. I saw some of these videos. I know they were off-topic or irrelevant to what needed to be taught. The videos were used to cover up the fact that there was no instructor to teach the class. This happened with both

classroom and clinical courses. I know that students went to clinical sites and found no instructor there. They would wait an hour or two and then come back to the school.

9. RSHT also did a poor job of preparing students for certification and licensing examinations that they must pass at the end of their education. Students must pass these exams to obtain a credential in their field of study from the state or from an independent organization. Much of the material that is tested on these examinations had to be cut out of the RSHT curriculum because not enough time was allotted for the material. The information that was cut out was critical to what the students needed to learn in order to pass the certification exams. The school also failed to conduct adequate review classes to prepare the students for these exams.

10. RSHT was also unable to place students in appropriate externships. The school kept losing externship sites because students performed so poorly on their externships and could not perform basic tasks. They performed poorly because the school did not teach them adequately and give them the opportunity to develop their knowledge and clinical skills. In direct response, many health care facilities refused to take any more RSHT students as externs. RSHT knew that it could not provide enough externships to qualify students to pass the certification exams at the time it was encouraging students to come to the school. RSHT knew that it's track record was terrible in getting externships, yet the school still told students to come to the school and promised they would be able to pass the certification exams and get high paying jobs.

11. Without enough suitable sites, RSHT assigned students to inappropriate facilities for their externships. For example, students who were in school to become licensed practical nurses in hospitals and in surgical settings were assigned to daycare facilities and nursing homes. Students could not get proper and worthwhile training at such facilities. Externships at such

facilities also do not count toward the clinical training hours students must have before they can sit for the LPN licensing examination. I think it is very likely that RSHT falsified records so that its students could sit for the exam. I know that students had to have a certain number of externship hours and grades in order to sit for certain exams. I saw students sitting for exams that I know did not have enough clinical hours or externship hours or grades to qualify. The only way this could have happened was if RSHT falsified records.

12. Employers have had poor experiences with RSHT graduates as well as with externs because of the poor education offered at RSHT. As a result, the school's reputation is very bad and it is difficult for RSHT graduates to find jobs in the area. Many employers simply do not want to hire RSHT students.

13. Another practice at RSHT was changing students' grades. Administrators regularly pressured me to change grades so that students would not fail out. Ms. Blakey and Ms. Barnes were two of the administrators who told me to change the grades of my students. I believe that Daisy Williams, the director of the campus, pressured Ms. Blakey and Ms. Barnes to get teachers to change the grades. Daisy Williams told me that my job was to retain all my students. I had to hand in my grade book at the end of each module and I know that after I handed it in, some students' grades were changed from failing to passing. This allowed RSHT to continue to earn money from the students because it kept the students from failing out of the school. I refused to change grades. I felt this was wrong. Students that failed should not be given passing grades or allowed to stay in the school. I left the school because I did not want any part of this practice of changing grades.

14. The vast majority of the students at RSHT's Richmond campus were poor and African-American. I believe this was intentional. Administrators admitted that the school

targeted its marketing efforts at areas that were predominantly low-income and African-American. I talked to the enrollment advisers or "reps" who were responsible for marketing efforts. They made clear to me that they deliberately targeted African-American neighborhoods. I know that particular zip codes were targeted on the basis of race. The reps were told to go to African-American zip codes, but not to white zip codes. The reps told me that African-American neighborhoods were targeted because it was thought that African Americans were vulnerable. The reps thought that African Americans would agree to take out loans and come to RSHT without asking any questions and inquiring about terms, costs, price, or what they would get from their education. These marketing efforts included targeted flyers and telephone calls. Administrators said that prospective students from the targeted areas were easier to persuade to enroll because they did not have much to lose.

15. I know that all of the recruiting reps when I was at the school were African-American. The reps told me that they knew they could flash their smiles and convince African-American female applicants to agree to take out loans without asking any questions. The reps told me that they knew many of the applicants did not have any idea what they were getting into.

16. I also know that RSHT advertised on the African-American radio stations, like 106.5 and Power 92. RSHT did not advertise on white radio stations like Q94. The reps told me that they went to African-American high schools to recruit students to come to the school. They did not care if the students were qualified or would be able to pass the certification exam. They just wanted to find "bodies" to fill spots at the school so RSHT could get more loans from the government and make more money.

17. The reps worked on commission. I do not know exactly how it worked, but they made more money if they brought in more students. The reps had quotas they were supposed to meet for each quarter. If they exceeded those quotas, the reps made more money.

18. It was obvious to me as an instructor that the school was routinely enrolling an unusually large number of students from socioeconomically disadvantaged backgrounds who did not have the skills to succeed in college, yet failing to provide them with the necessary support to overcome those disadvantages.

19. The school's admissions staff, also known as "enrollment advisors," gave prospective students lots of hope about their futures if they enrolled, but it was false hope because the school simply was not set up to make students successful. The advisors or reps made false promises about jobs that applicants would get even when they knew the students were not up to it.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: September 27, 2011.

BY: Tiana Branch
Tiana Branch

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF MICHELLE S. ARCHER

I, Michelle S. Archer, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from June 2007 until April 2009. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program in October 2009.
3. I left RSHT with about \$20,000 in federal student loans that I cannot afford. I also had to pay out of my own pocket to RSHT every month. The amount fluctuated every month, but would range from \$80 to \$100.

Michelle Archer
FL002064

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that I would earn around \$16/hour. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. The school did not tell me that I would have to pay a monthly out of pocket fee before I enrolled.

10. I knew I was interested in furthering my education, so I asked the admissions officers about the transferability of credits. RSHT assured me that it was accredited and that the credits would transfer to any other school.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. In fact, I purchased independent study materials from a website to prepare. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

14. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher because the turnover rate was so high. For example, in one course, we had three or four different teachers. Sometimes we would have to sit out for five weeks until the school was able to find a teacher. In one of our core Surgical Technology courses, RSHT could not find an appropriate teacher and ended up assigning a Radiology teacher to teach the course.

15. Although I did manage to complete my externship, it was not at all what RSHT told me it would be like. I spent my first ten weeks at Southside Regional Medical Center, but then had to sit out for five weeks before RSHT could find me another placement at Sentura Hospital to complete the remainder of my externship. I know many students did not get an externship placement at all.

16. Another problem with my externship was that I didn't have most of the skills that the staff at the hospitals expected to me know. They expected me to know the various instruments, how to set up the operating table, and how to gown and glove, but I didn't have these basic skills because the skills were not taught to us at RSHT. I heard some of the surgeons and surgical technicians comment that RSHT did not properly prepare us to work in the operating room.

17. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. I have applied for around 40 jobs, but I have never gotten a response. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

18. I know very few people from RSHT who have found jobs in their field of study.

19. RSHT's career services office has given me very little help in finding a job.

20. Instead of working as a surgical technician, I work full-time as an aide for mentally disabled patients. My position now is unrelated to what I studied at RSHT and I could have gotten this position without ever attending RSHT.

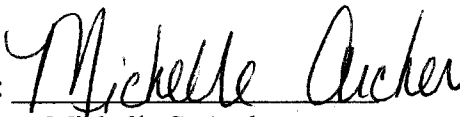
21. I was supposed to pay about \$119/month on my student loans, but I cannot afford to pay so much. I was able to defer repayment, and in 2010 I enrolled in John Tyler Community College for Human Services with a specialty in disabilities.

22. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a

mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 21, 2011

BY: 
Michelle S. Archer

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JUDITH T. BERRY

I, Judith T. Berry, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from May 2006 until May 2008. The school is also known as “Richmond School of Health and Technology.”
2. I was enrolled in the Medical Billing and Coding program at the Chester campus. I completed and graduated from the program.
3. I left RSHT with about \$19,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month. After my first year at RSHT, this monthly payment went up to \$114.

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4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass the proper certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the proper certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn significantly more than I was making at my current job. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. They also told me it would not cost me very much to repay the student loans I would need to attend RSHT. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that the classes I would need to

take were offered in the evenings. They also told me that I would be able to complete my entire externship in the evenings.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. For example, RSHT did not prepare me for the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

14. Only after I spent months studying for the exam, passed it, and began looking for a job did I learn that the certification exam that RSHT had administered, which is given by the National Center for Competency Testing ("NCCT"), is not recognized by most employers. Employers instead generally recognize a different organization's certification, but RSHT students cannot take the other organization's certification examination.

15. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, there was a two-month period during my time at RSHT when the only instruction I received was from various administrators who would each come to my class for a few days at a time and talk about things that had nothing to do with Medical Billing and Coding. For instance, the librarian would just come into the class and sit with us.



16. I complained about the lack of teachers to the student advisor at the Chester campus on multiple occasions, but he never did anything to help.

17. Textbooks were also a major problem. Books were included in tuition, and RSHT was responsible for providing those books, but we didn't receive our medical billing and coding textbooks until four months before graduation. None of the prior courses I had taken before that time were specific to billing and coding.

18. RSHT also failed to give me an appropriate externship. Although RSHT had promised me that I could do an externship at night, once the time for my externship came, they told me that I would have to quit my day job if I wanted to be assigned to an externship. This was not an option for me. I could not afford to quit my job to attend a daytime externship.

19. RSHT could not find any proper externships for us. In place of a proper externship where I would learn firsthand how to be a billing and coding specialist, RSHT assigned me to a computer software class on-campus. I spent most of my time performing computer tasks that were completely unrelated to Medical Billing and Coding. Even in that class, we did not receive working software for several weeks and our instructor did not know how to operate the software. This was not a valuable experience and was not at all like what RSHT told me it would be like.

20. I have tried very hard to get a job as a billing and coding specialist since graduating from RSHT, but I have been unsuccessful.

21. I know very few people from RSHT who have found jobs in their field of study.

22. RSHT's career services office has given me no help finding a job.

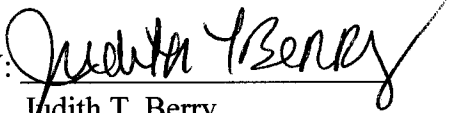
23. Instead of working in Medical Billing and Coding, I work at as an operations coordinator for a community services board. This is the same job I had before I went to RSHT.

24. I was supposed to pay close to \$200/month on my student loans. I paid this amount for approximately two years, but I could not afford to pay so much. I recently had to file for bankruptcy.

25. I am African-American.

26. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 18, 2011

BY: 
Judith T. Berry

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF NICHELE D. BLAKES

I, Nichele D. Blakes, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from April 2007 until December 2008. The school is also known as “Richmond School of Health and Technology.”
2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.
3. I left RSHT with about \$15,000 in student loans that I cannot afford. I also had to pay \$80 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me at a local hospital where I would obtain valuable clinical experience related to my field of study.

7. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. The school also did not tell me that I would have to pay \$80 per month out of pocket. Also, RSHT told me that I would not have to pay back the loans. About 6-months after I started at RSHT, I found out that I had a 14-day period to back out of enrolling at RSHT, but no one from RSHT told me about that grace period when I enrolled.

8. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

9. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

10. For example, RSHT did not prepare me for the certification exam – in fact, no one ever even mentioned the exam to me when I first signed up. Also, RSHT did not tell me when I enrolled that I would have to pay the cost of the exam, which was between \$300 and \$400. Right before the exam, RSHT did say that it would not pay that cost. I opted not to take the exam because I could not afford the cost, and because I knew that I would have to teach myself a lot of the material on my own if I wanted to pass. I know many other students who did take the

certification exam and did not pass it, and I believe that they failed because RSHT did not teach us what we needed to know to pass the exam. Even the few students who I know passed the exam still have not found jobs as surgical technicians.

11. Later, in the Spring of 2011, I got a letter from RSHT representing that they had in fact paid the cost of the exam back in 2008 when I graduated. If they had actually paid that cost, and if I had known that they had paid the cost, I would have taken the exam.

12. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. Sometimes our teacher simply wouldn't show up for class and we would sit and wait for hours. Even when a teacher did show up, he or she never lasted very long. The high teacher turnover rate created a very difficult learning environment.

13. Textbooks were also a major problem. The school often gave us out of date books and sometimes we didn't receive our textbooks for a class until after the class had already started.

14. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. Our mock operating room at RSHT was nothing like an actual operating room. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

15. One of the externships that RSHT assigned me to was totally inappropriate. Getting a proper externship was a crucial part of what my education at RSHT because certification as a surgical technician requires being on a surgical team for 150 procedures. For one of externships, I had to wait three to five months before RSHT assigned me to a site. Then, once I was there, I realized I would be expected to do a lot of things that I hadn't been trained to do at RSHT. The externship supervisor at the site was very upset that RSHT had not taught me

these skills, and I could overhear my supervisors talking to each other and expressing concern that RSHT had sent over a student who had not been trained already. As a result, I did not get to be on a surgical team for even close to 150 procedures, but RSHT changed the numbers to make it look like I did. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

16. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

17. I know very few people from RSHT who have found jobs in their field of study.

18. RSHT's career services office has given me no help finding a job. For example, career services employees from RSHT have only referred me to Monster.com and other employment websites. Those sorts of references are not helpful because I can find and use these sites on my own. I was expecting RSHT to actually point me to jobs in my field and to help me get interviews or offer other support that I would not be able to do on my own.

19. Instead of working as a surgical technician, I am a student at a community college. I decided to go back to college after spending a year and a half looking for a job with no success. Although I am finally getting a real education, none of my credits from RSHT transferred to the community college. RSHT never told me that my credits would not transfer. I wasted over a year of my life at RSHT.

20. I was able to defer repayment of my student loans for a year, but I do not know how I am going to make the payments when the year is over.

21. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and African-American people like myself. For example, I regularly

see commercials for RSHT on daytime television shows with predominantly African-American viewerships like *Maury* or *The Jerry Springer Show*.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 21, 2011

BY: Nichele D. Blakes
Nichele D. Blakes

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF LINDA BLAND

I, Linda Bland, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT beginning in the Winter of 2009 until April 2011. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Surgical Technology program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with thousands of dollars in federal student loans that I cannot afford. I also had to pay \$40.00 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study, including 10 weeks in an operating room, and 5 weeks in "central sterile" (the place in the hospital where surgical instruments are sterilized).

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would provide job placement for its graduates.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT did not prepare me for the certification exam. I studied very hard on my own using copies of an online certification study guide purchased by another student; however, I did not pass the exam. I did not receive study materials from RSHT. I had to study a

lot of material that we never learned in class. The majority of the topics covered on the test were not covered in my classes at RSHT.

13. Another big reason that we didn't learn what we needed to learn at RSHT was that we didn't have a teacher for about a month. During this time, an RSHT administrator filled in. The administrator did not know how to instruct our class, and didn't have any knowledge about the topics that were supposed to be covered in the class. This class was our core class for the Surgical Technology program, but when we asked questions in class the administrator could not answer them. However, despite the fact that we were not learning anything, we still had to come to class for the purposes of attendance.

14. Another big problem with RSHT was that the school did not have adequate medical equipment and supplies for our instructors to use to teach us. For example, the instruments supplied by RSHT were old. One of our instructors had to bring instruments that his employer no longer used. At times I could not practice certain skills because RSHT did not have or provide the proper equipment or supplies.

15. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Instead I spent all of my externship in "central sterile," where I only sterilized and packed instruments. I was told that they did not have a site for me to get my operating room hours, and would only graduate on time if I did the full 15 weeks in "central sterile" Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified.

16. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

17. I know very few people from RSHT who have found jobs in their field of study, and not one person who graduated with me as found a job in our field of study.

18. RSHT's career services office has given me very little help in finding a job. All the career services office did for me was to edit my resume prior to graduation. I have not received any assistance in job placement.

19. Instead of working as a surgical technician, I work at Chippenham Johnston-Willis Hospital as a mental health technician. This is the same job that I had prior to attending RSHT.

20. I am supposed to make monthly payments on my student loans, but I cannot afford to pay so much. I was able to defer repayment for 8 months, but I do not know how I am going to make the payments when my loans come due on December 31, 2011.

21. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 20 2011

BY: Linda Bland
LINDA BLAND

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF MARQUITA T. CLANTON

I, Marquita T. Clanton, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from January 2007 until April 2008. The school is also known as "Richmond School of Health and Technology."

2. I learned about RSHT by word of mouth. Two friends of mine had just enrolled in about November 2006, and I was interested in a school that offered night courses because I worked during the day.

3. I was enrolled in the Medical Billing and Coding program at the Chester campus. I completed and graduated from the program in May 2008.

4. I left RSHT with about \$14,000 in federal student loans that I cannot afford. I also had to pay \$80 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

9. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. RSHT also did not tell me before I enrolled that I would have to pay a monthly fee out of pocket.

11. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and attend school at the same

time. RSHT staff assured me that I could do both and told me that the externship I would need to complete would be offered in the evenings.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. For example, RSHT did not prepare me for the certification exam. When I took the exam in 2009, I found that many of the questions were not related to areas we studied in my classes. I did not pass the exam the first time, and many of my classmates did not pass. I believe that the biggest reason that I and others did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

15. I took the exam again in 2010, and I passed. The only reason I passed the exam was that I studied very hard on my own. I purchased study guides not provided by RSHT, and I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us.

16. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, in one course, we went several days without a teacher. They would have the librarian check attendance and then just let us go home. Many of my classes were not supposed to get out until about 9:30 or 10:00 p.m., but they would in fact finish much earlier and I would be home by 6:00 or 7:00 p.m. When I started the first class specific to medical billing and coding, we did not have a teacher for the first two-weeks of class. There was also a high rate of turnover.

17. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, RSHT put students at different stages of their enrollment at RSHT in the same courses. Therefore the material was brand new to some of the students in the class, but other students had already learned the material or had taken other more advanced classes. This created a very difficult learning environment.

18. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books and sometimes we didn't receive our textbooks for a class until after the class had already started. When I was taking courses in 2007, RSHT gave us books from 2006. Each year the codes change and so out-of-date coding books, even if recent, are not helpful. It seemed wrong that we would pay for books but receive out-of-date books.

19. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

20. RSHT also failed to give me an appropriate externship. The school informed us toward the end of the program that they did not have any externship sites for us. I spent my entire "externship" in a computer lab. Instead of learning firsthand how to be a billing and coding specialist, I spent all of my time answering questions out of a CPT (Certified Preliminary Testing) review book. My externship was not a valuable experience and was not at all like what RSHT told me it would be like. I finished my program almost 3 months early because RSHT did not have a placement for me.

21. I have tried very hard to get a job as a billing and coding specialist since graduating from RSHT, but I have been unsuccessful. I have never gotten a response from

employers because they require experience, and I really have no experience since we didn't go out on an externship.

22. I know very few people from RSHT who have found jobs in their field of study.

23. RSHT's career services office has given me no help in finding a job.


24. Instead of working as a billing and coding specialist, I work at an elementary school for a before-and-after program.

25. I started paying about \$160/month on my student loans. I later changed to a different payment plan based on my income. Either way, I could not afford to pay the loans. I started an online program in Health Care Administration and Medical Records through University of Phoenix, so my loans are in deferment and I am not paying back the loans right now.

26. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

27. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 20, 2011

BY: 
Marquita T. Clanton

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF SHELISSA D. CLANTON

I, Shelissa D. Clanton, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from May 2006 until December 2006. The school is also known as "Richmond School of Health and Technology." I had to leave RSHT for a period because of a death in the family.

2. I was enrolled in the Medical Assistant program at the Chester campus.

3. I left RSHT with about \$14,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

4. I left RSHT in December 2006 because of a family emergency. When I tried to reenroll in April 2007, RSHT demanded that I pay an additional amount, about \$3000, out of

pocket. I did not have this money, and for this reason, I was unable to complete the Medical Assistant program and graduate with my classmates.

5. On my first visit to RSHT, I met with employees from the admissions and financial aid offices before I enrolled and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

9. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money.

11. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. For example, RSHT did not prepare me for the certification exam.

15. I opted not to take the certification exam for that reason. I knew from the poor quality of instruction at RSHT that if I took it, I would fail. Many of my classmates – even those that completed and graduated from the Medical Assistant program – took the exam and did not pass. They told me that the RSHT curriculum just did not match up with the certification exam.

16. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. Sometimes we would just sit in class waiting, but the teacher would never show up. Even when we did have a teacher, he or she never lasted for very long. There was a period when we literally had a new teacher every single week. This high teacher turnover rate created a very difficult learning environment. At one point, one of my RSHT teachers told us that we would not be able to find jobs when we left RSHT because RSHT was not a good school.

17. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. RSHT also did not provide us with all the supplies as promised – for example, we had to buy our own stethoscopes, which were very expensive. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

18. Many employers do not want to hire former RSHT students, because they know that RSHT does such a poor job of educating and training its students. When my teacher told us that we would not find jobs after leaving RSHT, she was right.

19. I know very few people from RSHT who have found jobs in their field of study.

20. RSHT's career services office has given me no help finding a job.

21. Instead of working as a medical assistant, I am unemployed.

22. I was able to defer repayment of my student loans for this year, but I do not know how I am going to make the payments when the year is over. When my loans enter repayment, I will have to pay about \$80 a month. I won't be able to afford that amount.

23. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and specifically African-American people like myself.

24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 20 2011

BY: Shelissa D. Clanton
Shelissa D. Clanton

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF VICTORIA DAVIS

I, Victoria Davis, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from November 2008 until September 2010. The school is also known as “Richmond School of Health and Technology.”

2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.

3. I left RSHT with about \$18,000 in federal student loans that I cannot afford. I also had to pay over \$3000 out of my own pocket to RSHT upfront.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

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5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

7. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us. The reason for this is because most of the questions on the exam were related to material that was never taught or covered in my RSHT classes. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

12. Another big reason that we didn't learn what we needed to learn at RSHT was that the quality of the instruction was so poor. One teacher would browse Facebook the entire class and did not teach us anything. Other teachers were clearly not knowledgeable and would say things that contradicted our textbooks. I would sometimes have to correct the teachers and assist my fellow students. I often felt that the teachers did not know the material they were supposed to be teaching.

13. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, I took an advanced anatomy course before I had taken the introductory level anatomy course. I had no choice in this because of the way that RSHT assigned my schedule. This created a very difficult learning environment.

14. Textbooks were also a major problem. Students had different editions of the textbooks. Despite the fact that I was paying for textbooks in my tuition every semester, I did not receive new textbooks after beginning at RSHT. The school only ordered new editions of textbooks for new students, while existing students were stuck with older editions. This made following along in class very difficult.

15. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. We often had to reuse old gowns and gloves. We also lacked basic surgical instruments and were forced to learn about them from pictures in the textbook.

16. Although RSHT did provide me with an externship at Southside Regional Hospital, RSHT did not prepare me for the externship. If I had not studied and prepared

extensively on my own, I would not have known what to do in the operating room. I had heard from my classmates that the RSHT courses did not prepare them for their externships, and so I spent significant amounts of time studying on my own in order to be prepared.

17. I have tried very hard to get a job as a surgical technician since graduating from RSHT and have applied to at least 15-20 openings in my field but I have been unsuccessful. This is despite the fact that I had my certification and graduated with honors and a 4.0 GPA. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. Even though I meet all of the qualifications, I have never even gotten an interview. My certification has now expired.

18. I know very few people from RSHT who have found jobs in their field of study.

19. RSHT's career services office has given me no help in finding a job. When I have called the career services office for assistance, I have been told to email them. Despite emailing them frequently, my many emails to them have gone unanswered.

20. Instead of working as a surgical technician, I work at Patient First as a medical assistant. I was able to get this job through a relative, and not with any help from RSHT. This is not job that I went to school for. I enrolled at RSHT so I could be a surgical technician in the operating room. I have not been able to do this.

21. I am supposed to pay \$206/month on my student loans, but it is very difficult to pay so much. I was able to defer repayment for a year, and have now been paying since November of 2011. But I do not know how I am going to make the payments month after month.

22. I am white, but the vast majority of students in my class were African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 21, 2011

BY: Victoria M Davis
Victoria Davis

PL002098

5. They told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the official certification exam and the necessary clinical experience.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn at least \$18-20 per hour straight out of school, and that I could expect that to go up. They told me that RSHT's career services office would give me extensive assistance in finding a job.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that the classes I would need to take were offered in the evenings.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. I did not pass the exam, and many of my classmates did not pass. I believe that the biggest reason that I and others did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

13. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, after one of our teachers was fired, we didn't get a replacement teacher until about four months later. During this time period, whenever we arrived for class, an administrator would simply tell us to sign an attendance sheet and leave. This happened in both my core class and my pharmacy class.

14. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books and sometimes we didn't receive our textbooks for a class until after the class had already started. In one class, the textbook that the students were given was different than the textbook that the teacher was referring to during class as the teacher had a newer, updated textbook.

15. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. For example, we never had enough gowns. Most of the equipment that the school did have consisted of broken instruments that teachers brought in from their other jobs in hospitals and doctors' offices. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. RSHT also failed to give me an appropriate externship. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures.

Instead I spent all of my first externship at Johnston-Willis Hospital in "central sterile" and all of my second externship at Daily Planet Dental, where I only sterilized and packed instruments. In fact, although RSHT told me otherwise, when I began my externship at Daily Planet Dental, I found out that their office does not even do surgeries and RSHT had told them I was a sterilization tech student, a program that RSHT did not even have. When I found out that I couldn't do surgeries at Daily Planet Dental, I complained to the school, who told me that my choice was either not to do an externship or to do the sterilizations.

17. Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified. It was also very hard to schedule my day job around my externship, as RSHT would call me and ask me to go to my externship with only an hour's notice. As a result of these last minute changes, I received written warnings at my work for the very first time.

18. RSHT's promise that I could complete the program in the evenings also turned out not to be true. About a year after I started at RSHT, I had to switch to day classes because RSHT stopped offering my classes at night.

19. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. I believe that many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. Even if I could get a job as a surgical technician, I now know that the jobs only pay approximately \$12 per hour, not \$18-20 per hour as RSHT originally told me.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT's career services office has given me very little help in finding a job, and they have been unresponsive to my phone calls and complaints.

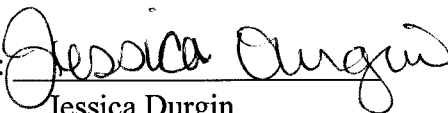
22. Instead of working as a surgical technician, I work at a catering company, which is the same job I had prior to starting at RSHT. I make \$12.36 an hour at the catering company.

23. I have not started paying my student loans back yet because I am working with the direct loans program to get a deferrment. I do not know how I am going to make these payments once they become due.

24. I am white, but the majority of students at RSHT are African-American.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 21, 2011

BY: 
Jessica Durgin

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF OLGA I. JIMENEZ

I, Olga I. Jimenez, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from October 2007 until October 2009. The school is also known as “Richmond School of Health and Technology.”
2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.
3. I left RSHT with about \$17,000 in federal student loans that I cannot afford. I also had to pay about \$5000 out of my own pocket to RSHT in the form of monthly payments.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.



5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. They also told me that the entire Surgical Technology program would only cost \$2,500, and everything (books, equipment, etc.) was included in that price.

10. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. When I met with RSHT employees before I decided to attend, I advised them that my first language was Spanish and that I was not completely comfortable speaking and understanding English. RSHT staff assured me that this would not be an issue and that I would still be able to learn everything I needed to become certified in my field.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. I did not pass the exam, and many of my classmates did not pass. I believe that the biggest reason that I and others did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

15. Only after I took the exam did I realize that this particular exam, provided by the National Center for Competency Testing and administered by RSHT, is not recognized by most employers. Employers instead generally recognize a different organization's certification, but RSHT students cannot take the other organization's certification examination. For this reason, I opted not to retake the exam after I failed it. I did not see any point in paying to take a useless exam that I felt unprepared for.

16. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, sometimes if our instructor didn't show up, RSHT would send in a librarian or a teacher from another program who knew nothing about Surgical Technology to supervise – but not teach – our class.

17. The classes at RSHT were also difficult places to learn because most of the instructors who did show up to teach were not experienced in their fields. As a result, I had to teach myself a lot of information from reading my textbooks or watching the movies that teachers put on. This was very difficult to do.

18. Textbooks were also a major problem. We often didn't receive our textbooks for a class until after the class had already started, which made it very difficult to learn both in and outside of class.

19. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

20. RSHT also failed to give me an appropriate externship, and getting a proper externship was a crucial part of what my education at RSHT was supposed to be, because certification as a surgical technician requires being on a surgical team for 150 procedures. RSHT promised me that I would have two externships at different locations and would gain hands-on experience at both. Instead, I only had an externship at one location. I did my externship at John Randolph Medical Center. Instead of learning firsthand how to be a surgical technician and assist doctors in the operating room, I spent most of my time in "central sterile," where I only sterilized and packed instruments. Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

21. RSHT's promise that I could complete the program easily despite my discomfort with English also turned out not to be true. I often had difficulty understanding things my teachers told me in my classes.

22. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful.

23. I know very few people from RSHT who have found jobs in their field of study.

24. RSHT's career services office has given me absolutely no help in finding a job.

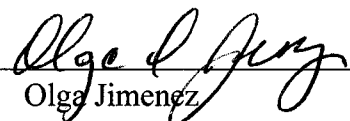
25. Instead of working as a surgical technician, I work in central sterile at a hospital in Raleigh, North Carolina.

26. I am supposed to pay \$200/month on my student loans, but I cannot afford to pay so much.

27. I am Latina. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or people of color like myself.

28. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 19, 2011

BY: 
Olga Jimenez

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF CHERYL JOHNSON

I, Cheryl Johnson, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from February 2009 until October 2010. The school is also known as “Richmond School of Health and Technology.”

2. I initially learned about RSHT from a television commercial on CBS, but I didn't think much of it until an RSHT employee called me directly to tell me about the program. This call was completely unexpected and unsolicited, but the RSHT employee made the program sound appealing, so I decided to enroll.

3. I was enrolled in the Medical Assistant program at the Richmond campus. I completed and graduated from the program.

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4. I left RSHT with about \$10,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

9. They also told me that if I attended and graduated from RSHT, I would be guaranteed a well-paying job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. They also led me to believe that the entire the cost of attending RSHT would be covered by my \$40 monthly payments. They explicitly told me that I would not have to take out any loans or repay any money.

11. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. For example, RSHT did not prepare me for the certification exam. When I took the exam, which I had to pay \$90 for, I found that many of the questions were not related to areas we studied in my classes. I did not pass the exam even though I took it twice, and many of my classmates did not pass. I believe that the biggest reason that I and others did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

15. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. When we did have a teacher at RSHT, he or she never stayed for more than a few weeks. This high turnover rate created a very difficult learning environment.

16. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books that were filled with typos and other errors and sometimes we didn't receive our textbooks for a class until after the class had already started.

17. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. As a result, we spent very little time in the lab, and we didn't learn a lot of basic clinical skills at RSHT.

18. RSHT also failed to give me the proper preparation for my externship. I did my externship at Vernon J. Harris Medical Center. The staff at Vernon J. Harris tried to provide a positive learning experience for me, but I did not have all of the skills that they expected me to

know. I didn't have these skills because these skills weren't taught to us at RSHT. As a result, the nurse manager and head R.N. at Vernon J. Harris decided that she would not take any more RSHT students.

19. I have tried very hard to get a job as a medical assistant since graduating from RSHT, but I have been unsuccessful. Even though certification is not technically required to work as a medical assistant, in practice it is what employers want. Also, many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT's career services office has given me absolutely no help finding a job.

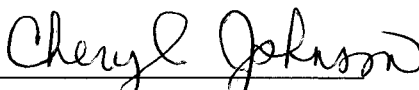
22. Instead of working as a medical assistant, I am unemployed.

23. I am supposed to pay \$165/month on my student loans, but I cannot afford to pay so much.

24. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 19, 2011

BY: 
Cheryl Johnson

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF ANDREA M. MCCLAMB

I, Andrea M. McClamb, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2007 until January 2009. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Medical Assistant program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with about \$10,000 in federal student loans that I cannot afford. I also had to pay around \$50 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

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5. For example, they told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. RSHT told me that I would not have to pay back some of the loans, but I later found out that that was not true.

8. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

9. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

10. For example, RSHT did not prepare me for the certification exam – in fact, no one ever even mentioned the exam to me. Also, no one ever told me that I would have to pay to take the certification exam. For these reasons, I opted not to take it. I know that I will need to study a lot of material on my own if I want to pass. I also cannot afford to pay the cost of taking the exam. I believe that the biggest reason that many other students who did take the certification exam did not pass it is that RSHT did not teach us what we needed to know to pass the exam.

11. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, in one of my classes, the teacher was absent for an entire week. The following week, RSHT brought in a new teacher who had no experience

in the medical assistant field and admitted that she was “learning as [she] went along.” She spent most of the class time talking about her personal life and was fired soon after she started. After she left, we didn’t get a new teacher for quite some time, maybe about a month. During this time, occasionally, an administrator would come in and ask us to sign an attendance sheet before dismissing us. Other times, no one would even tell us that a teacher wasn’t going to show up – we would sit in the classroom waiting until we figured out that we should just go home.

12. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, after I graduated, I found out that I actually still needed to take one more class in order to complete the program. I have no idea how RSHT managed to overlook this. Assigning classes out of order created a very difficult learning environment.

13. RSHT also failed to give me an appropriate externship. I did my externship at a doctor’s office called Dominion Medical. Instead of learning firsthand how to be a medical assistant and to perform tasks like taking patients’ vital signs, I spent most of my time sitting at a desk answering phones. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

14. Another problem with my externship was that I didn’t have most of the skills that the staff at Dominion Medical expected to me know. If I had these skills, perhaps the staff would have given me more responsibility. I didn’t have these skills because the skills were not taught to us at RSHT.

15. I have tried very hard to get a job as a medical assistant since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

16. I know very few people from RSHT who have found jobs in their field of study.
17. RSHT's career services office has given me no help finding a job.
18. Instead of working as a medical assistant, I work at McDonald's.
19. My loans are currently in deferment. When they enter repayment, I will have to pay between \$70 and \$100 month on my student loans. I cannot afford to pay that amount and do not know how I will be able to pay back my loans.
20. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and African-American people like myself.
21. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 20, 2011

BY: Andrea McClamb
Andrea M. McClamb

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF BARBARA MILES

I, Barbara Miles, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2006 until 2008. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.
3. I left RSHT with about \$18,000 in federal student loans that I cannot afford. I also had to pay approximately \$2000 out of my own pocket to RSHT when I initially enrolled.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange a nearby externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a high-paying job.

9. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. I did not pass the exam, and many of my classmates did not pass. I believe that the biggest

reason that I and others did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

13. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, one day one of my teachers walked out in the middle of class and never came back to the school.

14. When we did have a teacher at RSHT, he or she never stayed for more than a few weeks. This high turnover rate created a very difficult learning environment.

15. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books and sometimes we didn't receive our textbooks for a class until after the class had already started.

16. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

17. RSHT also failed to give me an appropriate externship. After I finished my classes, I had to wait over a month before I was assigned to an externship. Part of my externship also was over an hour away from my home even though RSHT had promised me that it would be easy to commute to my externship.

18. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. While I did have some opportunities to assist in the operating room, I felt very uncomfortable doing so and my opportunities were limited because I had not learned the proper skills at RSHT prior to my externship. Because RSHT did not arrange a proper externship for

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me or teach me the skills that the staff at my externship site expected me to know, I did not get my 150 procedures and cannot be certified.

19. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT's career services office has given me no help finding a job.

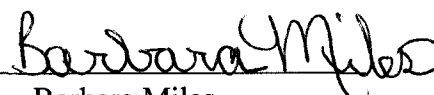
22. Instead of working as a surgical technician, I initially worked as a security guard making \$8.50 an hour. In September of 2011, still unable to find work as a surgical technician, I began working as a customer service representative making \$12.06 an hour.

23. I cannot afford to pay my student loans. I was able to defer repayment for a year, but I do not know how I am going to make the payments when the year is over.

24. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 19, 2011

BY: 
Barbara Miles

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF CHARLENE M. MOORE

I, Charlene M. Moore, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from November 2004 until January 2007. The school is also known as “Richmond School of Health and Technology.”
2. I learned about RSHT from a television commercial on Channel 6.
3. I was enrolled in the Licensed Practical Nursing (“LPN”) program at the Richmond campus. I completed and graduated from the program.
4. I left RSHT with about \$15,000 in federal student loans that I cannot afford. I also had to pay \$960 out of my own pocket, which I would pay in monthly installments.

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5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified and licensed by Virginia as an LPN. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes.

I did not pass the exam, and many of my classmates did not pass. I believe that the biggest reason that I and others did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

13. I retook the exam several months later and passed. The only reason I passed the second time was that I studied very hard on my own. I bought my own study guide and had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

14. Another big reason that we didn't learn what we needed to learn at RSHT was the poor quality of instruction. For example, some of the teachers were clearly not knowledgeable about the subject matter. Sometimes teachers would change in the middle of the mod. Sometimes teachers just wouldn't show up and we would be sent home. For an entire mod, one teacher had to teach two classes at the same time, and she would have to run back and forth between two classes. The high turnover rate and shortage of qualified teachers made for a very difficult learning environment.

15. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, we did not have enough dummies to practice on. My classmates and I were never taught how to draw blood or take someone's blood pressure.

16. I am working as an LPN right now, but not because of any help from RSHT. My supervisor knew that I did not have proper training, but was willing to let me learn on the job.

17. I know very few people from RSHT who have found jobs in their field of study.

18. I was paying \$293/month on my student loans, but I cannot afford to pay so much. The only reason I have not defaulted is because I'm going back to school at J. Sargeant Reynolds Community College to be an registered nurse, and my loans have been deferred.

19. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

20. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 20 2011

BY: Charlene M. Moore
Charlene M. Moore

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF ZULMA MUNIZ

I, Zulma Muniz, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2007 until 2009. The school is also known as “Richmond School of Health and Technology.”
2. I learned about RSHT from a television commercial on a local station.
3. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.
4. I left RSHT with about \$23,000 in federal student loans that I cannot afford. I also had to pay \$35 out of my own pocket to RSHT every month, but approximately six months into my program at RSHT this increased to \$50.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study. They said there would be plenty of externship sites and placement would not be a problem.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

9. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. They also told me it would cost \$35/month to repay the student loans I would need to attend RSHT. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. When I met with RSHT employees before I decided to attend, I had a part-time job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that the externship I would need to complete would be offered in the evenings.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. For example, RSHT did not prepare me for the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us. I bought a study guide, and this is what I studied in order to pass, RSHT did not provide me with any materials. I barely passed even with this study guide, so without it, I don't think I would have passed at all.

15. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. We went for several weeks without a teacher because our teachers would just quit or wouldn't show up. At times, the Radiology instructor or the librarian would lead our class, but they were not qualified Surgical Technology instructors. My classmates and I would just sit there and read the textbooks and try to teach each other.

16. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, I took Surgical Techniques II before taking Surgical Techniques I. Also, all of the general education courses, like English and Math, came at the end of the program rather than the beginning. This created a very difficult learning environment.

17. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books and sometimes we didn't receive our textbooks for a class

until after the class had already started. Sometimes we would use the same book for multiple years, and never received updated books.

18. I had to sit out about 5 weeks because there were no externship sites available. I wrote a letter to the Corporate Office and demanded that they give me an externship site. Immediately after I sent this letter, I got a placement at St. Francis Hospital and Sentara Williamsburg Regional Medical Center. I was unable to do my externship hours in the evening as RSHT had promised. I did manage to get 150 cases, but only because I would stay late in order to get all the cases I needed. I could not get all the required cases in the time that RSHT had allotted for the externship.

19. Another problem with my externship was that I didn't have most of the skills that the staff at St. Francis and Sentara expected to me know. I didn't have these skills because the skills were not taught to us at RSHT. I found it extremely tough, because there were students there from other schools. I felt they were way more advanced. I had to study a lot on my own. I would look up the cases the day before, take notes and make sure I knew which instruments were going to be used.

20. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. I have submitted about 30 applications. I had one interview, but I was told that in order to get a job in the surgical technology field, I needed at least 1-2 years of experience. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

21. I know very few people from RSHT who have found jobs in their field of study.

22. RSHT's career services office has given me no help in finding a job.


23. Instead of working as a surgical technician, I work full-time at VCU Medical Center as a medical assistant.

24. I am supposed to pay \$100/month on my student loans, but I cannot afford to pay so much. I have deferred the payments until I finish nursing school at John Tyler Community College. John Tyler would not accept any of my credits from RSHT, and so I had to start over again despite having graduated from RSHT.

25. I am Puerto-Rican, but the majority of my classmates were African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

26. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 19, 2011

BY: 
Zulma Muniz

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF INGRID A. PLATA

I, Ingrid A. Plata, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2008 until February 2011. The school is also known as “Richmond School of Health and Technology.”

2. I initially enrolled in the Medical Assistant program at the Richmond campus, but after four months decided to transfer to the Surgical Technology program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with over \$20,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary surgical cases.

8. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. The RSHT employee spoke very quickly and made no effort to answer the questions that I asked her about my financial documents and loans.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT did not prepare me for the certification exam. When I took the exam for the first time, I found that many of the questions were not related to areas we studied in my classes. I did not pass the exam, and many of my classmates did not pass. I believe that the biggest reason that I and others did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

13. I retook the certification exam and passed. The only reason I passed the exam the second time was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

14. In order to remain certified, I have to re-take the certification exam every year, or pay considerable sums of money to participate in continuing education. RSHT never told me that I would have to keep re-taking the exam or that I would have to pay money for the continuing education.

15. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, our pharmacology class went an entire mod without a qualified teacher. An RSHT administrator would stand in and make us watch videos or do worksheets, but it was clear that he was not qualified to teach pharmacology. We were consistently let out of class several hours early.

16. Textbooks were also a major problem. Books were included in tuition, and RSHT was responsible for providing us books, but we didn't receive our books for one class until midway through the course.

17. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic skills at RSHT because of the lack of equipment and supplies, such as gowns, gloves, and instruments.

18. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. RSHT told me, however, that it had no surgical sites available. I had to arrange an externship on my own. I arranged an externship at the orthopedist's office that I was and still am working at. I made sure to ask RSHT's externship coordinator if it would be acceptable for me to do my entire externship at the orthopedist's office, and the externship coordinator assured me that it would not be a problem. After I finished my externship and submitted proof of completion to the National Center of Competency Testing (NCCT), however, NCCT called me and told me that my externship at the orthopedist's office was insufficient because I needed more general surgery experience in order to be certified.

19. Approximately a month after this lawsuit was filed, RSHT contacted me and told me they had an externship site for me at Johnston-Willis Hospital. I completed a five week externship at Johnston Willis and obtained the requisite surgical experience. I am now a certified surgical technician.

20. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful.

21. I know very few people from RSHT who have found jobs in their field of study.

22. RSHT's career services office has given me no help in finding a job. I was not even aware that RSHT had a career services office.

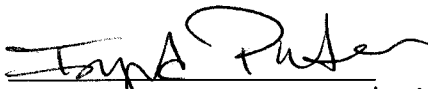
23. Instead of working as a surgical technician, I work at an orthopedist's office as a patient representative. This is the same job that I held before attending RSHT.

24. I am supposed to pay almost \$300/month on my student loans, but I cannot afford to pay so much. I was able to defer repayment of some of my loans for a year, but I am responsible for paying some of them now and cannot afford to do so. I do not know how I am going to make the payments when my deferred loans enter repayment.

25. I am Hispanic, but the vast majority of students at RSHT are African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

26. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 19, 2011

BY: 
Ingrid A. Plata Ingrid Plata

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JUNE C. RHODES

I, June C. Rhodes, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from February 2010 until August 2010. The school is also known as "Richmond School of Health and Technology."
2. I was enrolled in the Medical Assistant program at the Chester campus.
3. I left RSHT with about \$10,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn at least \$22 an hour as a medical assistant and that medical assistants were in greater demand than LPNs. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, I learned very little about being a medical assistant during my time at RSHT, so I left the school without taking the certification exam because I did not see any



point in paying to take an exam that I knew I would fail. Many of my classmates took the exam and did not pass. I believe that the biggest reason that they did not pass is that RSHT did not teach us what we needed to know to pass the exam.

13. Another big reason that we didn't learn what we needed to learn at RSHT was the poor quality of the teaching. For example, in my medical assistant core class, my teacher did not know the material, and could not answer any questions about the material. She also did not keep control of the class and was unprofessional with the students and would bring her family with her to class. Often, she would tell students who were late to class that she would forgive their lateness if they went out to buy her food. On one occasion she told us that she did not have time to grade our exams, so she gave all of the students in the class a 100% on the exam.

14. Teachers generally just showed us videos or read aloud from the textbook. Often, the classrooms were complete chaos, with both teachers and students socializing and engaging in vulgar conversations. This created a very difficult learning environment.

15. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books and sometimes we didn't receive our textbooks for a class until after the class had already started. Some of the textbooks we received were never used in our classes.

16. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. Due to the lack of equipment and supplies at RSHT, we were often forced to practice medical procedures without proper protection. For example, we never had enough rubber gloves when we practiced drawing blood from each other or cleaned out hazardous waste boxes containing used needles. On one occasion I cleaned out the hazardous waste box from the previous evening on my own without any help

because I had prior experience in hazardous materials from previous jobs, none of which I learned at RSHT. I did this myself because none of the other students could help because we had not been taught the proper procedure for doing so in our classes at RSHT.

17. We also didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. We were supposed to have daily clinical classes, but often had no clinical classes in a week, and at most had two during the week.

18. I left RSHT because I felt that I was not learning anything in my classes, and would only continue to waste my time and would have nothing to show for my degree.

19. I know very few people from RSHT who have found jobs in their field of study.

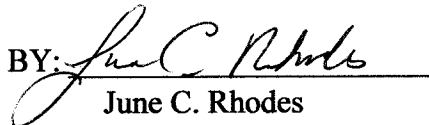
20. Instead of working as a medical assistant, I have a part-time contract job in dental assisting. I am called in to work very infrequently, and do not make enough money to support myself.

21. I was able to defer repayment of my student loans due to unemployment forbearance, but I do not know how I am going to make the payments when my deferment ends.

22. I am white, but the vast majority of students at RSHT were African-American. I think RSHT intentionally targets its marketing and recruiting at minorities and lower-income people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 21, 2011

BY: 
June C. Rhodes

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JAMES SCOTT

I, James Scott, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2008 until 2009. The school is also known as “Richmond School of Health and Technology.”
2. I learned about RSHT from an advertisement in the Richmond Times-Dispatch.
3. I was enrolled in the Pharmacy Technician program at the Richmond campus. I completed and graduated from the program.
4. I left RSHT with thousands of dollars in federal student loans that I cannot afford.
5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

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6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study and allow me to practice as a pharmacy technician in Virginia. This was supposed to include the knowledge I would need to pass the certification exam.

9. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. For example, RSHT did not prepare me for the certification exam. I borrowed notes and a practice test from a pharmacy technician who graduated from another school. When I reviewed these study materials, I found that much of the material was not covered in my classes

at RSHT. I decided not to take the certification exam, because I knew that I would fail. I cannot get a license in Virginia as a pharmacy technician without passing the exam.

14. Another big problem with RSHT was the poor quality of instruction. For example, my teacher lacked the understanding and expertise in some key areas of pharmacy that involved math. Some students and I had to meet to teach this part of the curriculum to ourselves.

15. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. Our teacher had to bring in her own supplies for us to use. We never had the opportunity to work with any medical equipment. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. RSHT also failed to prepare me for the externship. I did my externship at CVS pharmacy. Because RSHT did not provide me with any hands on experience in the classroom, I didn't have skills that the staff at CVS expected me to know. For example, I did not know how to measure dosages, and was not familiar with many generic and brand name medications.

17. I have tried very hard to get a job as a pharmacy technician since graduating from RSHT, but I have been unsuccessful. Working as a pharmacy technician in Virginia requires a license from the state and I cannot get the license because RSHT did not deliver on its promises to me. Moreover, many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. In fact, one potential employer equated an RSHT education to a high school education.

18. I know very few people from RSHT who have found jobs in their field of study.

19. RSHT's career services office has done nothing to help me find a job.

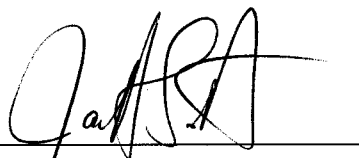
20. Instead of working as a pharmacy technician, I am unemployed.

21. I am supposed to pay \$2,200 on my student loans, but I cannot afford to pay it.

22. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 19, 2011

BY: 
James Scott

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

RICHMONDSCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF TAMESHA TELFAIR

I, Tamesha Telfair, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a current student at RSHT. I started in January 2010 and I am scheduled to graduate in October 2012. The school is also known as “Richmond School of Health and Technology.”

2. I am enrolled in the Medical Assistant program at the Richmond campus.

3. I will leave RSHT with about \$13,000 in federal student loans that I cannot afford. I also have to pay \$40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that thus far have not turned out to be true.

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5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that if I needed extra help in any class, I would have the opportunity to meet one-on-one with my teachers after class.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

9. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 10 above.

12. The education I received from RSHT has not even come close to living up to RSHT's promises or my expectations.

13. For example, when I first started, RSHT provided me with 2 or 3 one-on-one tutoring sessions, but then abruptly stopped those sessions despite their earlier promises, and

never explained why. They never provided me with any after school or after hours extra help sessions.

14. RSHT also has not prepared me for the certification exam, so I have not scheduled myself to take it. I do not see any point in taking an exam that I know I will fail. I also cannot afford to pay for the exam more than one time, and do not want to take it where I know I will fail and waste my one opportunity to pass it. Many of my classmates who have taken the exam have not passed. I believe that the biggest reason that they did not pass and that I feel unprepared is that RSHT did not teach us what we needed to know to pass the exam.

15. Another big reason that we haven't learned what we need to learn at RSHT was that often we don't have a teacher. Oftentimes teachers are late to class, and an administrator will sit in for the teacher, but won't teach any material. Some of our teachers do not have significant medical assistant experience, and sometimes, our teachers even show up to class drunk. It is very difficult to learn in this environment.

16. Textbooks are also a major problem. Books are included in tuition, but the school often gives us out of date books and sometimes we don't receive our textbooks for a class until after the class has already started. In one class, we had to take a test before we had received our books. Everyone in the class failed the test because no one had a book to study from.

17. Another big problem with RSHT was that the school does not have enough medical equipment and supplies for our instructors to use to teach us. We haven't learned a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

18. RSHT also failed to give me an appropriate externship. I did my first externship for just a few days at Charles City Medical Center. I did my second externship at Richmond Community Hospital. Instead of learning firsthand how to be a medical assistant, I spent most of

my time doing random administrative tasks like filing paperwork and answering phones, but did barely any medical tasks. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

19. I do not feel ready to work as a medical assistant because I have not been taught clinical or academic skills at RSHT. When I graduate, I do not think I will be able to find a job. I know very few people from RSHT who have found jobs in their field of study.

20. RSHT's career services office has given me very little help in finding a job, even though I am almost done with my program.

21. I am supposed to start paying back my student loans six months from now, but I do not know how I am going to make those payments.

22. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 21 2011

BY: Tamesha Telfair
Tamesha Telfair

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF ANITA E. THOMAS

I, Anita E. Thomas, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from February 2008 until October 2009. The school is also known as “Richmond School of Health and Technology.”

2. I was enrolled in the Surgical Technology program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with over \$14,000 in federal student loans that I cannot afford. I also had to pay about \$40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me I could earn as much as \$70,000 per year as a surgical technician.

8. They also told me that RSHT's career services office would give me extensive assistance in finding a job. In fact, they guaranteed that they would place me in a job within one year of graduation.

9. The school filled out my financial aid paperwork for me and told me to sign the forms.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I even went out and bought my own study guide. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe

that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

13. Another big reason that we didn't learn what we needed to learn at RSHT was that there was a very high rate of turnover for RSHT employees. For example, we did not have a program dean for about five months, and then, within a 15 month time period, we had three *different* deans. There were also four different campus directors during my time at RSHT. This turnover rate created a very difficult learning environment.

14. Textbooks were also a major problem. For example, in one of my classes the instructor did not have a textbook to use.

15. Also, the sequencing of externships and courses was very poorly planned, or not planned at all. Before I enrolled at the school, RSHT told me that the externships would be at the end of my time at the school. Instead, one of my externships was very early in my time at RSHT. Because I had not taken enough courses at that point, I was unprepared for the externship. When I showed up for the externship, my supervisor expected me to have the training to start scrubbing and assisting immediately, but RSHT had not prepared me to do these things at all.

16. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, we practiced scrubbing in a sink that was not at all like a scrub sink, and so the experience was very different from the sterile scrubbing experience a surgical technician would have in a hospital.

17. RSHT also failed to give me an appropriate externship. I was supposed to do three different externships, but one of them was cancelled at the last minute. Two of the

externships had the potential to be positive experiences except I did not have the skills that the staff expected me to have, so I did not feel comfortable assisting in the operating room. I did not have these skills because these skills were not taught to us at RSHT.

18. My final externship at Henrico Doctor's Hospital was completely useless since I spent all of my time in "central sterile" sterilizing and packing instruments. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified.

19. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Employers do not want to hire uncertified surgical technicians. Moreover, many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. Even if I could get a job as a surgical technician, I now know that the jobs pay significantly less than RSHT told me they would when I signed up.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT's career services office has given me no help finding a job.

22. Instead of working as a surgical technician, I work as a purchasing manager at an audio-visual company. This is the same job that I had before I attended RSHT.

23. I was able to defer repayment of my student loans, but I do not know how I am going to make the payments when the deferment period is over in February 2012.

24. I am African-American. The majority of my classmates at RSHT were also African-American.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 21, 2011

BY: Anita E. Thomas
Anita E. Thomas

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF FRANKLIN T. TURNER

I, Franklin T. Turner, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from October 2009 until May 2011. The school is also known as "Richmond School of Health and Technology."
2. I am African American. I learned about RSHT through a friend who was African American as well.
3. I was enrolled in the Surgical Technology program at the Richmond campus. I completed and graduated from the program.
4. I left RSHT with about \$8,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month for at least 8 months.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study. They also told me that they would supply me with a uniform.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

9. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. The school filled out my financial aid paperwork for me and told me to sign the forms.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. I did not pass the exam until the third time I took it, and many of my classmates never passed. I

believe that the biggest reason that I and others struggled with the exam is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

14. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, we would sometimes not have a teacher for a week or more in my core classes. Oftentimes, teachers were just bodies in the room; they made no real effort to actually teach students.

15. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. This created a very difficult learning environment.

16. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, we were never supplied with uniforms.

17. One of the externships RSHT arranged for me was not at all a valuable experience. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Instead I spent half of my externship at Johnson Willis in "central sterile," where I only sterilized and packed instruments. Because that externship was not appropriate, I did not get my 150 procedures and cannot be certified. I contacted RSHT seeking advice on how to get the rest of my 150 procedures, but no one has gotten back to me.

18. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Without the required number of cases I cannot get my

certification papers even though I passed the certification test, and without certification papers I cannot get a job in the field I studied. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

19. I don't know any of my classmates who have found a job in our field of study.

20. RSHT's career services office has given me no help in finding a job.

21. Instead of working as a surgical technician, I work at as a courier. I am struggling to make enough money to survive.

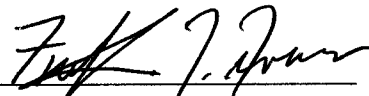
22. I started paying back my loans this month, December 2011. I am supposed to pay about \$90 a month, and I do not know how I am going to be able to continue to make these payments.

23. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. I worked hard at RSHT and never missed one day of class while I was there, but just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 20 2011

BY:


Franklin T. Turner

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

y.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF DEBRA WALKER

I, Debra Walker, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from June 2010 until October 2011. The school is also known as “Richmond School of Health and Technology.”

2. I was enrolled in the Medical Assistant program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with about \$20,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

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5. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

6. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

7. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

8. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

9. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

10. For example, RSHT did not prepare me for the certification exam. When I took the exam on December 9, 2011, I found that many of the questions were not related to areas we studied in my classes. The only reason I passed the exam was that I studied very hard on my own. I had to study from a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

11. Another big reason that we didn't learn what we needed to learn at RSHT was that the quality of instruction was poor. For example, one teacher was very unprofessional. She

was much more interested with being friends with some students than with teaching the course. It was supposed to be higher education, but it felt like kindergarten.

12. Textbooks were also a major problem. Books were included in tuition, but sometimes we didn't receive our textbooks for a class until after the class had already started. Other students didn't receive a textbook at all because RSHT would enroll them half way through the course. Even if we did receive some textbooks, they were often out of date. Our teacher acknowledged that our books were out of date, so sometimes we had to look up answers online because the answers in the book were not correct.

13. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, we ran out of needles because our supply closet was not secured, and we didn't even have a sink with running water or soap. When I had to practice drawing blood, I had to use hand sanitizer instead of soap and water. Also, we were supposed to learn how to draw blood from a model of a human arm. It was broken and so my instructor made us practice drawing blood on each other's arms. The EKG machine was also broken and old.

14. RSHT also failed to give me an appropriate externship. I did my first externship at Dominion Medical Care. Instead of learning firsthand how to be a medical assistant, I did administrative work like pulling charts and filing. My externship was not a valuable experience and was not at all like what RSHT told me it would be like. In fact, my externship supervisor was fired.

15. I spent my second externship at Richmond Pediatrics, which was also not a valuable experience. I did not have the computer skills that the staff at Richmond Pediatrics expected me to know.

16. Also, the sequencing of RSHT courses and externships was very bad. I was assigned to an externship before I had taken the relevant courses. For instance, I was expected to be able to use computers for certain tasks at my externship, but I hadn't taken the computer course at RSHT yet, so I did not know how to do the expected tasks. Only later did I take the relevant computer class at RSHT.

17. RSHT charged me \$720 for repeating a course, even though I did not repeat that course. RSHT employees acknowledged to me that I shouldn't have been charged that amount, but it is still on my financial documents and I think that RSHT still requested a disbursement of loans in that amount and did not return the money.

18. I have tried very hard to get a job as a medical assistant since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

19. I know very few people from RSHT who have found jobs in their field of study.

20. RSHT's career services office has given me very little help in finding a job. All the career services office does is career development classes. RSHT has not helped me find any positions in my field.

21. Instead of working as a medical assistant, I am still unemployed.

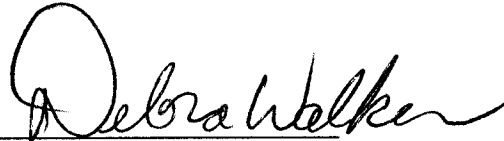
22. I am still in the grace period on my student loans. I do not know how I am going to make the payments when the grace period ends.

23. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school. I would talk anyone out of going to RSHT.

EXECUTED WITHIN THE UNITED STATES ON: December ~~21~~²⁴, 2011

BY:

A handwritten signature in cursive script, appearing to read "Debra Walker". The signature is written in dark ink and is positioned above the printed name "Debra Walker".

Debra Walker

Dh

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JAVON WINSTON

I, Javon Winston, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from February 2009 until September 2010. The school is also known as “Richmond School of Health and Technology.”
2. I was enrolled in the Medical Assistant program at the Richmond campus. I completed and graduated from the program.
3. I left RSHT with about \$8000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that Medical Assisting is a very versatile career and that graduating from RSHT's Medical Assistant Program would make me more employable. They also told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. The only reason I passed the exam was that I studied very hard on my own. I had to purchase

my own study-guides and books to teach myself a lot of material that we never learned in class. RSHT did not provide me with any materials to study for the exam. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

13. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. Even when we did have a teacher, he or she rarely stuck around for more than a couple of weeks. For example, one of my teachers always showed up to class high and would fall asleep during class, and then after a few weeks, she left the school. Then we got another teacher for the same class who was fired shortly after she started because of her background check. This high teacher turnover rate created a very difficult learning environment as it felt that we were always starting over again and not moving forward in our classes.

14. Textbooks were also a major problem. They were often out of date, if we received them at all. For example, in a class where we were supposed to learn how to do insurance billing, we never received insurance books to practice calculations. Also, the books often did not match what was being covered in class by the teachers, making the books useless.

15. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. RSHT also failed to give me an appropriate externship. I never got the opportunity to practice important skills for medical assistants like taking EKGs or drawing blood. RSHT never checked in with me to see how my externship was going as they said they

would. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

17. I have tried very hard to get a job as a medical assistant since graduating from RSHT, but I have been unsuccessful. Since passing the NCCT certification exam, I have learned that most employers do not recognize this exam, so my certification is virtually meaningless. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

18. I know very few people from RSHT who have found jobs in their field of study.

19. RSHT's career services office has given me very little help in finding a job. They only help they have given me is to provide me with the names of a few potential employers. The names of the employers were listed on websites that I could access by myself, and I did not receive any assistance from RSHT that I couldn't have done by myself on a computer. None of these potential employers were willing to hire me.

20. Instead of working as a medical assistant, I work as a personal home aide making \$8.26 an hour.

21. I was able to defer repayment of my student loans, but I do not know how I am going to make the payments when the deferment period is over.

22. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 20, 2011

BY: 
Javon Winston

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

Defendant.

I, Donna Wyatt, hereby state as follows:

1. I was a student at RSHT from 2008 until 2009. The school is also known as “Richmond School of Health and Technology.”

3. I was enrolled in the Medical Billing and Coding program at the Richmond campus. I completed and graduated from the program, but I have never received a diploma because I still owe RSHT money.

4. I left RSHT with about \$9,000 in federal student loans that I cannot afford. I also had to pay approximately \$90 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that the cost of taking the certification exam would be covered in my tuition.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

9. They also told me that I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that I would earn at least \$30,000 a year. They told me that RSHT's career services office would give me extensive assistance in finding a job, and I was led to believe that I would be able to secure a job immediately upon graduating.

10. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. For example, RSHT did not prepare me for the certification exam that would have enabled me to get a job. I did not take the exam because RSHT said that the cost of the exam would be covered by my tuition, but when it came time for me to take the exam, RSHT told me that I would have to pay for it out of pocket. I did not have the money to pay for it out of pocket. Moreover, RSHT was offering the NCCT ("National Center for Competency Testing") exam, but one of the instructors at RSHT told me that the certification wasn't even what employers are looking for. Even if I had taken the exam, I would not have been eligible for anything but an entry level job. Some of my classmates had to take the exam several times. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

14. Another big reason that we didn't learn what we needed to learn at RSHT was the poor quality of our teachers. For example, one of the teachers could not control the class and would ignore students who raised their hands to ask questions about the material. The class was essentially self-taught and was not a conducive learning environment as many students would be fighting and shouting in the classroom while the teacher did nothing.

15. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes regardless of experience. Students who were just beginning the program were mixed in with advanced students. This created a very difficult learning environment

16. Textbooks were also a major problem. Books were included in tuition, but sometimes we didn't receive our textbooks for a class until after the class had already started. I didn't get the book for my last class until nearly four weeks after the class had already started, even though the class was only supposed to be five weeks long. As a result I had to take an extension and missed my original graduation date.

17. Another big problem with RSHT was that the school did not have enough equipment for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, the computers at RSHT always seemed to be undergoing maintenance. Some days the computers wouldn't work at all, and we would waste entire classes just trying to get internet access.

18. RSHT did not arrange an externship for me as I expected. I assumed that there would be an externship, because everyone else in the other programs had an externship. The admissions officers did not explain that Medical Billing and Coding was an exception. I tried a few times to get an externship on my own, but I haven't pursued it aggressively because I know that I don't have the proper training.

19. Even though certification is not technically required to work as a billing and coding specialist, in practice it is what employers want in order to hire anyone beyond an entry level position. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT's career services office has given me almost no help in finding a job. All the career services office did was to help edit my resume, but has nothing beyond that to help me in my job search.

22. Instead of working in the medical billing and coding field, I work as a custodian at a middle school making \$9/hour.

23. I was supposed to pay \$130/month on my student loans, but I could not afford to pay so much. I was able to defer repayment for a year, and then obtained a modification on my loan because I could not pay the original amount. I now pay \$75/month, but it is hard for me to make those payments, and I am worried that I will not be able to keep making them without a higher paying job.

24. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: December 19, 2011

BY: Donna Wyatt
Donna Wyatt

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF M. CATHRYN DUESING

I, M. Cathryn Duesing, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee at the Chester campus of RSHT, a school that is also known as "Richmond School of Health and Technology."

2. I first worked at RSHT from approximately August 2008 until July 2009 as the Clinical Coordinator and as a tutor and instructor for the Surgical Technology program. I then worked at RSHT from approximately January 2010 until March 2011 only as an instructor in the Surgical Technology program.

3. The first time I left RSHT, it was because I did not think that RSHT was preparing students for their clinical assignments (also called externships). My position entailed placing students in externships and monitoring their progress, and I did not want to be held

accountable for problems that arose because the students lacked the skills required at their externship sites. RSHT's failure to prepare students adequately for their externships was very discouraging.

4. I was willing to return as an instructor because I thought being in the classroom would allow me to avoid the kinds of problems that led me to leave the first time. In addition, a number of administrators had left or changed positions within RSHT, and I was hopeful that this would lead to improvements in the quality of the education provided by the school.

5. I left RSHT the second time because the school had not improved, as my experiences discussed below demonstrate. When I left, the school told me that I could come back any time.

6. One of the biggest problems with the Surgical Technology program was the curriculum. The curriculum was handed to me and I was not allowed to alter any of the content. I believe it was the same curriculum used for the Surgical Technology students at RSHT's Richmond campus. In my opinion, the curriculum was very poorly arranged and did not cover many of the things that the students needed to learn.

7. I asked about adding other materials to the curriculum, such as additional texts, and was told that I could not. The two main people I would bring questions like this to were Sandy Kerrick and Debbie Harris, who each served as campus director during my employment at RSHT. I was told that the school was not going to change the curriculum because it had been working for several years and because it would take a great deal of effort to change it. To the best of my recollection, Ms. Harris is the person who told me this. I was also told that there was no money in the budget for additional texts. I did not think these were acceptable responses or reflected sufficient concern for the quality of the education that the students were receiving.

8. Another problem was that RSHT used a “drop in” approach for the Surgical Technology program. New students were dropped in at whatever point in the curriculum we were currently covering. This meant that at the beginning of a module, students were added who were new to the program and who had not studied any of the material leading up to the area we were covering. I had to slow the class down considerably and revisit material covered in prior modules so that the new students were not entirely lost. This was very detrimental and unfair to the students who were not new, but RSHT’s approach left me no real choice.

9. RSHT failed to provide textbooks promptly to new students, which also slowed classroom progress considerably. This was a regular occurrence at the beginning of a new module. New students typically were not given textbooks for at least three or four days, if not a week. Especially because the modules were so short (approximately five or six weeks), this was a significant problem.

10. Students also fell behind because RSHT would not let them attend classes if they were not up to date on the monthly payments they owed to RSHT for the portion of the tuition that they had to pay out of pocket. Instructors were regularly given “do not admit” lists of students who were prohibited from attending class for this reason.

11. RSHT also failed to provide appropriate substitute teachers for the Surgical Technology classes. I was told that if I was sick and had to miss class, I would have to find a substitute on my own. The school did not maintain a list of qualified substitutes. As a result, I came to class sometimes when I was sick. When I could not come, an administrator would sit in my class and I understood from my students that there was no instruction. Likewise, on several occasions I was directed to substitute in classes that I was not familiar with and could not teach.

12. RSHT admitted students into the Surgical Technology program who were not remotely ready for it. Admitting unqualified students harmed the rest of the students. Many of the other instructors agreed that admitting unqualified students was a significant problem at RSHT. I asked Ms. Kerrick and Ms. Harris to raise the admissions bar at least a little, for example, by giving a very basic math and reading comprehension test. The school refused.

13. I had numerous students who were not able to pass their coursework because of the low admissions standards. However, Ms. Kerrick and Ms. Harris told me not to fail students for academic reasons. Ms. Kerrick likewise told me not to fail students for failing to attend their externships.

14. The school also lacked adequate laboratory equipment for the Surgical Technology students. On my first day as an instructor in the program, I and the other program instructor were told to set up a lab, which had not existed before. We were not given adequate funds to do so and were told that we could not buy new equipment that the students needed unless we used our own money (which I did to a degree). Later on, the school did reimburse us for some of the money we spent out of our own pockets to purchase laboratory equipment.

15. RSHT was unable to provide students with adequate clinical experience because it could not obtain a sufficient number of appropriate externships. Many healthcare facilities said that they would not take RSHT students because they had found the students to be so unprepared in the past. Other facilities placed RSHT students in central sterile, where the students would merely clean and pack instruments instead of gaining surgical experience. As a result, students did not get sufficient surgical experience to learn what they needed to learn or to qualify to sit for the certification examination after completing their studies at RSHT.

16. RSHT also failed to provide meaningful job placement assistance. The school offered students little more than some assistance with preparing their resumes.

17. Another big problem with RSHT's Surgical Technology program is that the students are not eligible to sit for the certification examination recognized by the Association of Surgical Technologists because RSHT is not accredited by the Commission on Accreditation of Allied Health Education Programs. That is by far the preferred certification among employers. The certification examination that RSHT students are eligible to take is instead offered by an organization that I had never heard of before coming to RSHT, even though I had been working in the field for over ten years. This means that RSHT Surgical Technology graduates, even when they complete the program successfully, in my opinion, are much less attractive to employers than students from other schools.

18. I did not teach in the Community Home Health program, but problems in that program were well known and of great concern to many instructors. The students often did not have a teacher, which at one point continued for approximately three weeks. We asked Ms. Kerrick and Maxine Stine, an administrator who did not work at the Chester campus, to hire a qualified instructor, but they were not responsive. The overall feeling I and others had was that RSHT did not care at all about the Community Home Health program. In the end, RSHT sent the students to another school just to get a very basic credential.

19. RSHT also engaged in practices that I thought were dishonest. For example, students were required to pass their coursework before being sent to an externship. Some students of mine who did not pass were nonetheless permitted by Ms. Harris and Ms. Kerrick to do their externships. I believe this practice potentially put patients at risk. There were also

students who had not satisfied the externship requirement but were permitted to graduate and sit for the certification examination, even though this was contrary to RSHT's stated policies.

20. Another dishonest practice occurred at the admissions stage. When there was no space in a program that a prospective student wanted to enroll in, the school would tell the student that she could enroll in a different program and then transfer into the program that she wanted. The school persuaded students to enroll this way, but it was not true. If the students wanted to change programs, none of their credits (except credits from the general education classes) transferred to another RSHT program.

21. I also discovered that my grade books were changed on several occasions. This must have been done by somebody on the school's staff because I was required to leave my grade book each night in a place that was only accessible to staff, not students.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: May 23, 2012.

BY: 
M. Cathryn Duesing

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF JIMETRIA CHAVIS

I, Jimetria Chavis, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from November 2006 until April 2008. The school is also known as “Richmond School of Health and Technology.”
2. I learned about RSHT from a former RSHT student who had only been enrolled for one module. I also heard commercials for RSHT on 106.5 FM and 92.1 FM. These are both hip-hop and R&B radio stations in the Richmond area.
3. I was enrolled in the Surgical Technology program at the Chester campus.
4. I left RSHT with about \$11,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

9. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn at least \$34,000 a year. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that the classes I would need to take were offered in the evenings. They also told me that I would be able to complete my externship in the evenings.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, in one of my general education classes, one of our teachers simply stopped showing up halfway through the module. There was a period of time between when she left and when we got a new teacher when we didn't have anyone to instruct us.

15. RSHT also failed to give me an appropriate externship. I did my first externship at Tri-City Surgical for five weeks, and my second internship at John Randolph Medical Center for three weeks. I was supposed to do a third externship at another facility, but RSHT told me that they did not have anywhere to place me. In order to complete and graduate from the program, I was required to do 15 weeks of externships, but RSHT only provided me with 8. The two externships I did have were not a valuable experience and were not at all like what RSHT told me they would be like.

16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Instead I spent most of my internship in "central sterile," where I only sterilized and packed instruments. Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified. I also could not graduate without the full number of externship weeks, and was not able to even sit for the certification exam.

17. RSHT's promise that I could complete the program in the evenings also turned out not to be true. I ended up having to sit out for a module and shift around my work schedule because I found out it was impossible to complete the program in the evenings. RSHT also did not have any evening externships available, which made it very difficult for me with my existing work schedule.

18. I know very few people from RSHT who have found jobs in their field of study.

19. RSHT's career services office has not given me any help finding a job.


20. Instead of working as a surgical technician, I work at Southside Virginia Training Center. This is the same job that I had before I enrolled at RSHT.

21. I am supposed to pay \$129/month on my student loans, but I cannot afford to pay so much. I am currently making the minimum payment of \$5 per month, and will have to ask for forbearance in August of 2012.

22. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: May 23 2012

BY: 
Jimetria Chavis

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated, .

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF SHELIA CHEATHAM

I, Shelia Cheatham, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from August 2008 until April 2009. I left in April 2009 due to financial constraints, but came back in November 2010 and graduated in October 2011. The school is also known as "Richmond School of Health and Technology."

2. I learned about RSHT from a conversation with an African-American friend.

3. I was enrolled in the Medical Assistant program at the Richmond campus. I completed and graduated from the program.

4. I left RSHT with about \$11,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

9. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn at least \$12 per hour. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. For example, RSHT did not prepare me for the certification exam. I took the exam on January 13, 2012. I did not pass the exam, and in order to take it again I will have to pay \$135 out of my own pocket, money that I do not have. When I sat for the exam, the questions did not reflect anything I had learned in the Medical Assisting program at RSHT. I believe that the biggest reason that I did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

14. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, sometimes if our teacher didn't show up, we would just get sent home shortly after arriving at school. Even when we did have a teacher, he or she never lasted long. I had six different teachers during my core Medical Assistant class. The teachers were always unfamiliar with the curriculum and subject matter. This high teacher turnover rate created a very difficult learning environment at RSHT.

15. Textbooks were also a major problem. When I returned to RSHT in November 2010, I spent four weeks waiting for my textbooks. I had to do my reading from poor photocopies of friends' textbooks during that time. These were very hard to read and made it even harder for me to learn at RSHT.

16. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

17. RSHT also failed to provide me with the necessary skills to have a productive externship experience. I did my externship at a general practitioner's office. Instead of learning firsthand how to be a Medical Assistant, I spent most of my time doing random administrative tasks. The staff at my externship did not respect me or grant me any responsibility because they

know that RSHT does such a poor job of educating its students, and I didn't have most of the skills that they expected me to know. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

18. I have tried very hard to get a job as a Medical Assistant since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

19. I know very few people from RSHT who have found jobs in their field of study.

20. RSHT's career services office has given me no help finding a job.


21. Instead of working as a Medical Assistant, I am unemployed and receiving public assistance.

22. I cannot afford to pay my student loans. I was able to defer repayment, but I do not know how I am going to make the payments when my deferment period is over. Because I have so much debt from my time at RSHT and have been unable to find a job, I had to move out of my house. In my current home, I have had my electricity and heat turned off, and now only have electricity and heat because of a fuel assistance program. I am constantly worried that it may get cut off at any time.

23. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and especially African-American people.

24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: May 23 2012

BY: 
Shelia Cheatham

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF NACHAY S. HAWKINS

I, Nachay S. Hawkins, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from July 2009 until the end of 2010. The school is also known as “Richmond School of Health and Technology.”
2. I first learned about RSHT through word of mouth and from my aunt. I also saw commercials for RSHT on TV on channels like 9 and 11. The ads said you would be working in a hospital in no time and the school would help you create a resume and find a job.
3. I was enrolled in the Medical Assistant program at the Richmond campus.
4. I left RSHT with about \$5,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

9. They also told me that if I attended and graduated from RSHT, the school would guarantee me a job when I graduated. They told me that after I graduated I would either work at a medical center called Patient First or at McGuire Virginia Medical Center in Richmond. They told me I could expect a starting salary of \$12-14 per hour.

10. They also told me it would cost around \$40-50 per month to repay the student loans I would need to attend RSHT. The school helped prepare my financial aid paperwork and told me to sign the forms.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not come close to living up to RSHT's promises or my expectations.

13. The classes at RSHT were difficult places to learn because the curriculum was disorganized. For example, I took advanced classes in my field of study before completing basic education classes like English.

14. Another big problem with RSHT was the poor quality of instruction. For example, one teacher would put our textbook up on a projector and spend class simply reading out loud to us, telling us what to highlight. Homework and test answers were right in the book so the assigned work was not challenging. I mostly taught myself the material because I wasn't learning in class.

15. RSHT also failed to arrange an externship for me as promised. When I first talked to the externship coordinator in October 2010, I was told that part-time externships in the evening were available. However, when it came time to get an externship, the school said it only offered full-time externships during the day. They told me that there was no flexibility. I was working full-time while attending RSHT and was not able to go to an externship during the day. RSHT did not try to help me at all find an externship that worked with my schedule. I was not able to complete the externship, which was a requirement to graduate. I did not graduate from the program and was not able to take the certification exam.

16. I know very few people from RSHT who have found jobs in their field of study.


17. Instead of working as a medical assistant, I work at a food plant doing packing and inventory.

18. I have been able to defer my payments until May of 2013. I do not know how I am going to make my loan payments after the deferral period is over.

19. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a

mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: May 22, 2012

BY: 
Nachay S. Hawkins

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF KENYA K. LAYTON

I, Kenya K. Layton, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2010. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Medical Assistant program at the Richmond campus. I completed the program.

3. I left RSHT with about \$7000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. At the time that RSHT filled out this paperwork for me, they did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. RSHT did not provide me with any information about grants that I could receive to help finance my education.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. I did not pass the exam, and many of my classmates did not pass. I believe that the biggest

reason that I and others did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

12. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, we had one teacher that was supposed to teach the Medical Assistant classes. These classes were scheduled to meet four times per week. Our teacher never showed up for more than two of those four weekly classes, and when she did show up, she often left class early. RSHT did not provide a substitute teacher for these classes. Sometimes the Dean of RSHT would come to class when the teacher did not show up. The Dean was not familiar with the material that we were supposed to be learning. He would tell us that there was nothing for us to do, have us sign an attendance sheet, and excuse us from the class.

13. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, there were students who were placed in the Anatomy II class before they took Anatomy I. RSHT also placed students in the Medical Assistant class that were at different levels in the program. These students would have different books from the other students in the class who had been taking the class longer. This created a very difficult learning environment.

14. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

15. I have tried very hard to get a job as a Medical Assistant since graduating from RSHT, but I have been unsuccessful. Even though certification is not technically required to work as a Medical Assistant, in practice it is what employers want.

16. I know very few people from RSHT who have found jobs in their field of study.

17. RSHT's career services office has not been helpful to me. After I finished the program, I went to the career services office and told them that I needed help looking for a job. I was told that I could look on the bulletin board to see if there were any open positions anywhere. Other than telling me that I could look on the bulletin board, RSHT did nothing to try to help me find a job in my field.

18. Instead of working as a Medical Assistant, I work at CVS.

19. I am supposed to pay \$75.69 per month on my student loans. I was able to defer repayment for one year, but my deferment has now expired. I still cannot afford to pay this monthly amount, and will have to defer repayment for another year.

20. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

21. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: May 22 2012

BY: 
Kenya K. Layton

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF SIEARRA MABRY

I, Siarra D. Mabry, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from October 2008 until August 2009. The school is also known as "Richmond School of Health and Technology."

2. I learned about RSHT when I saw commercials on local television channels, including BET television.

3. I was enrolled in the Pharmacy Technician program at the Chester campus. I completed and graduated from the program.

4. I left RSHT with about \$5,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

SDM 002194

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified and licensed by Virginia in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

9. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that I would earn a good salary, start off making more money than I was currently making, and that my salary would increase each year. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and I felt rushed through the process.

11. Additionally, there were about twenty five student in my class, but I was told by the Admissions that the class size would be smaller.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. I did not pass the exam, and many of my classmates did not pass. I believe that the biggest reason that I and others did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

15. The classes at RSHT were also difficult places to learn because RSHT did not provide enough class time to learn all of the material. For example, we covered a new chapter in our textbook every other day. In every class we would receive textbooks that were not up to date, even though we had paid for those books. The classes were also taught out of chronological order. This created a very difficult learning environment.

16. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

17. One problem with my externship was that I hadn't learned the proper skills that the Walgreens' staff expected to me know. I didn't have these skills because the skills were not taught to us at RSHT.

18. I have tried very hard to get a job as a pharmacy technician since graduating from RSHT, but I have been unsuccessful. Working as a pharmacy technician in Virginia requires a license from the state and I cannot get the license because RSHT did not deliver on its promises to me.

19. I know very few people from RSHT who have found jobs in their field of study.

20. RSHT's career services office has given me very little help in finding a job. All the career services office has done is help me with my resume before I graduated.

21. I cannot afford to pay my student loans. I was able to defer repayment, but I do not know how I am going to make the payments when my deferment period is over.

22. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: May 12 2012

BY: Siearra D. Mabry
Siearra D. Mabry

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

y.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF GRACE L. SILNEY

I, Grace L. Silney, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from June 2010 until June 2011. The school is also known as “Richmond School of Health and Technology.”
2. I learned about RSHT by researching different schools in the area that offered night classes.
3. I was enrolled in the Community Home Health (CHH) program at the Richmond campus.
4. I left RSHT with about \$6,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

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5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that the certification I would receive through this program would be higher than a CNA ("Certified Nursing Assistant") certification, and right below an LPN ("Licensed Practical Nurse") certification.

8. I was told that the state of Virginia was in the process of approving this new level of certification that I would receive in the CHH program.

9. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study. RSHT told me that after I completed about nine months of coursework, I would spend about 40 hours per week working at the externship that RSHT arranged for me.

10. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that I would earn between \$ 30,000 and \$35,000 a year. I was told that the difference in pay would depend on whether I chose to work through Medicaid or to work through private caretaker arrangements with individual families. Also, they told me that my salary with the certification I would attain through this program would be greater than the salary of a person with a CNA certification. RSHT told me that there was a 99 percent chance that I would get a job in my field after I graduated. In fact, RSHT told me that they had relationships with facilities that had agreed to hire RSHT students right after they completed the program.



11. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. In fact, I felt rushed through the financial aid process by RSHT staff. An RSHT employee filled out my FAFSA, the Free Application for Federal Student Aid. I quickly signed the FAFSA and other forms. Currently, I do not understand the terms of my loans; in fact, all I know is that the interest is growing each day.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. I learned about halfway through the CHH program that there is no such thing as certification in "community home health" in Virginia and that RSHT did not know what certification examination I and the other CHH students would take.

15. I became so frustrated with the school upon learning this information that I left the program for approximately two to three months. I subsequently returned to complete the program after RSHT told me that they had a CNA certification available.

16. I also reported the school to the Better Business Bureau, to alert them to RSHT's deceptive practices.

17. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

18. Most days, our class was not even allowed to go in the lab. During my time at RSHT, I went into the lab only once. During that one time in the lab, the instructor taught us

how to wash our hands and how to make a bed. I did not find this lab time to be particularly useful.

19. RSHT also did not arrange an externship for me as promised. After I completed all of my coursework, I was told that I could choose between two locations to do my externship: a site in Richmond and a site in Petersburg. I chose Richmond, since it is a lot closer to where I live. When I called the Richmond facility to try to set up a time for me to start working, I was told that the facility was not accepting RSHT students. When I told RSHT about this issue, they told me that I could just do my externship in Petersburg. Petersburg is about 45 minutes away from the school, which made that location extremely difficult for me. Because I needed at least 50 externship hours to graduate, however, I had no choice but to accept the Petersburg externship. When I told RSHT that I could do the Petersburg externship, I was told that because there was already a student doing that externship, I would have to wait until the student was finished before I could begin working. I waited for about four months before I decided to leave the program. During the four months that I was waiting for an externship placement, RSHT tried to make me pay the \$40 monthly payments to the school.

20. I am supposed to pay around \$80 a month on my student loans, but I cannot afford to pay so much. I was able to defer repayment, but I do not know how I am going to make the payments when the deferral period is over.

21. I am white, but the vast majority of my program had African-American students.

22. I think RSHT intentionally focuses its marketing and recruiting at lower-income people. Most of the students in my program were lower income.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a



mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: May, 23 2012

BY: 
GRACE L. SILNEY

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF MARY SILNEY

I, Mary Silney, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I attended RSHT from June 2010 until August 2011. The school is also known as “Richmond School of Health and Technology.”
2. I learned about RSHT after my daughter saw a commercial on the television.
3. I was enrolled in the Community Home Health program at the Richmond campus. I completed and graduated from the program.
4. I left RSHT with about \$6,500 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

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5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study. They told me that I would be able to choose from a number of externship sites and that many of the externship sites were close to campus.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

9. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn \$13.00 to \$15.00 an hour, or even more than that. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that the classes I would need to

take were offered in the evenings. They also told me that I would be able to do my externship during evening hours.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. I learned near the middle of the CHH program that there is no such thing as certification in "community home health" in Virginia and that RSHT did not know what certification examination I and the other CHH students would take. RSHT staff told me that this would not be a problem, and they would find a way to get us certified.

15. At the very end of the CHH program, the school decided that we should take the Patient Care Technician certification exam. That exam would test skills that we did not learn at RSHT. After I complained that I had not enrolled in a program to be a Patient Care Technician and had not learned the proper skills to take that exam, RSHT stopped trying to help me get certified in any field, and would not help me take any certification exam.

16. I and many other CHH students were very upset with how RSHT handled the CHH program and the certification issue. We complained, and the school said that it would enroll us in a Certified Nurse Aide Training Program at another school, the Professional Career Institute. RSHT never enrolled us in that program. I graduated from RSHT without any certifications. I have been looking for a Certified Nurse Aide Training Program so that I can at least get certified in a healthcare-related field. The courses cost about \$1,000 and I do not have the money to take a course right now.

17. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies, and never got any hands on experience. We also did not have regular access to the computer labs.

18. Another problem with RSHT is that the textbooks we received were often out of date, and some were written and published in the 1980s.

19. RSHT's promise that I could choose from a number of externships that were close to campus also turned out not to be true. RSHT had one externship available. I did my externship at Heaven Sent. My externship was about a half an hour drive from where I live. I had a lot of problems coordinating my hours and getting transportation. I ended up having to borrow my daughter's car to get to my externship. Despite RSHT's promises, I was unable to do my externship in the evening, and had to ask my boss repeatedly for permission to attend my externship. This caused strain in my relationship with my boss.

20. Another problem with my externship was that I didn't have most of the skills that the staff at Heaven Sent expected to me know, such as how to take blood pressure. I didn't have these skills because the skills were not taught to us at RSHT. As a result, I would often do nothing while at my externship because the staff did not trust that I had been taught the skills to assist with patients.

21. Instead of working as a Community Home Health professional, I work at Rite Aid, which is the same job that I had before I enrolled at RSHT. RSHT has not done anything at all to help me find a job. Although I graduated last year, RSHT still has not given me my diploma. The first time that I spoke with someone about my diploma, I was told that someone had stolen the school seal and that they could not give me an official diploma without it. When I

called back, RSHT told me that they did have a seal for my diploma and that they would put it in the mail. They never put the diploma in the mail. I have called RSHT about 14 times since I graduated last year and I still do not have my diploma.

22. I have not entered repayment on my student loans yet, but my loans will be due soon. I am worried that I will not be able to pay back my loans.

23. I am white and lower-income. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American persons.

24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I do not even have a diploma. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: May~~23~~ 2012

BY: 
Mary Silney

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF ROCHELLE M. SMITH

I, Rochelle M. Smith, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from August 2009 until October 2011. The school is also known as “Richmond School of Health and Technology.”
2. I learned about RSHT on a television commercial. One of the stations I saw advertisements for RSHT on was BET.
3. I was enrolled in the Medical Assistant program at the Richmond campus. I completed and graduated from the program.
4. I left RSHT with about \$7,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

9. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

13. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes.

I did not pass the exam, and many of my classmates did not pass. I believe that the biggest reason that I and others did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

14. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, our pharmacology teacher only came to class about twice a week even though we had class four days a week. Even when he did show up, he often left class early. In my first medical assistant class, the teacher often came to class looking inebriated, and she would leave the classroom without teaching and leave us to fill out workbooks on our own. Throughout my time at RSHT, we were often left to teach ourselves, and to teach each other.

15. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. The students had to practice on each other, because there weren't enough dummies to go around. For example, we first learned to draw blood by practicing on each other. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. When I arrived at my externship at Richmond Community Hospital, Dominion Medical (3rd Floor), I hadn't learned any of the proper skills that were needed for the externship. I didn't have these skills because the skills were not taught to us at RSHT. The medical assistants at my externship taught me all the skills I learned. They had also gone to RSHT, and understood that I had not learned the skills at RSHT because they hadn't either.

17. I have tried very hard to get a job as a medical assistant since graduating from RSHT, but I have been unsuccessful, particularly because I don't have my certification. Even though certification is not technically required to work as a medical assistant, in practice it is

what employers want. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

18. I know very few people from RSHT who have found jobs in their field of study.

19. RSHT's career services office has given me very little help in finding a job. All the career services office did is help me with my resume before I graduated. Since then they have offered no assistance in helping me to find a job.


20. I have given up on finding a job as a medical assistant, and am now focused on a different career path. I believe I wasted the time I spent getting my medical assistant degree from RSHT.

21. I am supposed to pay \$75/month on my student loans, but I cannot afford to pay so much. I am currently in deferment on my loans, and have deferred twice, but my loans will be due again in September 2012. I am not sure how I will make the payments once my loans are due again.

22. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: May 22, 2012

BY: 
Rochelle M. Smith

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF LISA M. SOTO

I, Lisa M. Soto, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from July 2010 until March 2011. The school is also known as "Richmond School of Health and Technology."
2. I learned about RSHT from a television commercial.
3. I initially enrolled in the Medical Assistant program and later transferred to the Community Home Health (CHH) program at the Richmond campus. RSHT charged me a \$75 enrollment fee before I began the Medical Assistant program. I had to pay the \$75 fee again when I transferred to the CHH program. I completed the CHH program.

4. I left RSHT with about \$4,200 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

9. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They showed me a flyer that listed the salaries of various health care professionals, which led me to believe that I would be able to earn more money working as a community home health professional than at my job with Kroger, the grocery store where I was working at the time. They also told me that RSHT's career services office would give me extensive assistance in finding a job.

10. The school filled out my financial aid paperwork for me and told me to sign the forms.

11. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to continue working and attend school at the same time. RSHT staff assured me that I could do both.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. I learned near the end of the CHH program that there is no such thing as certification in "community home health" in Virginia and that RSHT did not know what certification examination I and the other CHH students would take. After I graduated, the school decided that we should take the Patient Care Technician certification exam. I did not take the exam because the exam tested skills that we did not learn at RSHT. I do not think that I would have passed the exam by studying the materials that RSHT gave us. In addition, the Patient Care Technician certification is a lower certification than what I thought I would receive by attending RSHT. The students in my class that I know took the exam did not pass it.

15. I and many other CHH students were very upset with how RSHT handled the CHH program and the certification issue. We complained, and the school enrolled us in a six-week Certified Nurse Aide (CNA) Training Program at another school, the Professional Career Institute. It cost RSHT less than \$1,000 to enroll me in that program, but RSHT did not refund any of the money that I had paid for the CHH program.

16. Another big problem with RSHT was that we did not have enough access to the lab to enable our instructors to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of access to the lab facilities.



17. RSHT also failed to give me an appropriate externship. I did my externship at Heaven Sent, which was over 40 minutes away. My externship was not a valuable experience and was not at all like what RSHT told me it would be like. Instead of learning firsthand how to be a community home health professional, I got little hands on experience. Most of the time, we only observed the nurses performing their daily tasks. We rarely were able to perform any tasks ourselves. Some days we would sit there for hours and do nothing.

18. RSHT's promise that I could complete the program in the evenings also turned out not to be true. I had to do my externship during the day, which meant switching my work schedule to the night. I often had my externship from 8:00 a.m. to 1:00 p.m. and my job from 2:00 p.m. to 10:00 p.m.

19. I have been unable to get a job as a community home health professional since graduating from RSHT because employers do not recognize the program. Moreover, many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. Even if I could get a job as a certified nurse aide, I was told by an employer that I would only be paid \$10 per hour, because I lack experience. At my current job at Kroger, I get paid \$13.63 per hour. It frustrates me that I went to RSHT to better my career opportunities and increase my earning potential, but the education that I received can only get me a lower-paying job than the one I already had before attending RSHT.

20. I know very few people from RSHT who have found jobs in their field of study. I do not know anyone who was in my class that has a job as a community home health professional or as a certified nurse aide.

21. RSHT's career services office has given me very little help in preparing me to find a job. I checked in with RSHT's career counselor about job opportunities. All the career

counselor did was give me a list of jobs that I could have easily found myself with a quick internet search or in the newspaper.


22. Instead of working as a community home health professional, I am an assistant manager at Kroger.

23. I am supposed to pay \$50 per month on my student loans, but I cannot afford to pay so much. I was able to defer repayment for a year, but I do not know how I am going to make the payments when the year is over.

24. I am white and Latina. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: May 23, 2012

BY: 
Lisa M. Soto

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF DEBRA WALKER

I, Debra Walker, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from June 2010 until October 2011. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Medical Assistant program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with about \$20,000 in federal student loans that I cannot afford. I also had to pay \$40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

6. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT's career services office would give me extensive assistance in finding a job.

7. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

8. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

9. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

10. For example, RSHT did not prepare me for the certification exam. When I took the exam on December 9, 2011, I found that many of the questions were not related to areas we studied in my classes. The only reason I passed the exam was that I studied very hard on my own. I had to study from a lot of material that I found online in addition to what I learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us.

11. Textbooks were also a major problem. Books were included in tuition, but sometimes we didn't receive our textbooks for a class until after the class had already started.

Other students didn't receive a textbook at all because RSHT would enroll them halfway through the course. Even if we did receive some textbooks, they were often out of date. Our teacher acknowledged that our books were out of date, so sometimes we had to look up answers online because the answers in the book were not correct.

12. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. For example, we ran out of needles because our supply closet was not secured, and we didn't even have a sink with running water or soap. When I had to practice drawing blood, I had to use hand sanitizer instead of soap and water. Also, we were supposed to learn how to draw blood from a model of a human arm. It was broken and so my instructor made us practice drawing blood on each other's arms. The EKG machine was also broken and old.

13. RSHT also failed to give me an appropriate externship. Instead of learning firsthand how to be a medical assistant, I did administrative work like pulling charts and filing. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

14. Also, the sequencing of RSHT courses and externships was very bad. I was assigned to an externship before I had taken the relevant courses. For instance, I was expected to be able to use computers for certain tasks at my externship, but I hadn't taken the computer course at RSHT yet, so I did not know how to do the expected tasks. Only later did I take the relevant computer class at RSHT.

15. I have tried very hard to get a job as a medical assistant since graduating from RSHT, but I have been unsuccessful. I believe that many employers do not want to hire RSHT

graduates because they think that RSHT does such a poor job of educating and training its students.

16. I know very few people from RSHT who have found jobs in their field of study.

17. RSHT's career services office has given me very little help in finding a job. All the career services office does is career development classes. RSHT has not helped me find any positions in my field.


18. Instead of working as a medical assistant, I am still unemployed.

19. Because I am unemployed, I was able to defer my loans. I do not know how I am going to make the payments when the deferral period is over.

20. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

21. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school. I would talk anyone out of going to RSHT.

EXECUTED WITHIN THE UNITED STATES ON: May 23, 2012

BY: 
Debra Walker

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF DANA JOHNSON

I, Dana Johnson, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee of RSHT, a school that is also known as "Richmond School of Health and Technology."

2. I worked at RSHT from approximately August 2009 until December 2010 as the Externship /Placement Coordinator at the Richmond campus. My responsibilities included finding health care facilities in the area where RSHT students could do their externships (such as doctors' offices and hospitals), maintaining relationships with facilities that accepted RSHT externs, scheduling students for their externships, monitoring their progress, and helping students find jobs after graduating.

3. I am African-American, as was a large majority of the student body at the Richmond campus. A large majority of the student body also came from low-income backgrounds.

4. RSHT's externship program was deeply flawed. One of the major problems with the externship program was that the school did not have enough sites to place the students in appropriate externships. Maxine Stein, a senior administrator, told me that I was hired primarily because this problem was so significant in the Surgical Technology program. RSHT lacked sufficient sites because it had a very poor reputation the health care community and because many health care facilities stopped accepting externs from RSHT after having bad experiences with them. I spent a great deal of time trying to get more externship sites, and it was very frustrating because so many health care facilities did not want to be associated with RSHT.

5. For example, the Bon Secours system of hospitals used to accept RSHT students for externships and I tried to persuade Bon Secours to accept them again. At a meeting of RSHT's Advisory Board, someone from Bon Secours told me that they would not accept RSHT students again because the students had not known what they were doing. She also told me that RSHT had failed to fulfill promises it made to Bon Secours to send RSHT staff to the externships site to help supervise the students.

6. Externship sites frequently found that the RSHT students were not prepared, and the students themselves felt unprepared as well. I remember one student who called me nearly in tears when she started her externship at the Stony Point Surgery Center because she realized that she did not know what the Center expected her to know. The students' lack of preparedness was the result of fundamental problems at RSHT. In the Surgical Technology classes, for example, students were supposed to become familiar with a range of surgical instruments and supplies, but

the school did not have them. Instructors resorted to bringing in instruments and supplies from their other jobs to help the students. Sometimes the students did not even have a teacher because many teachers left out of frustration with the problems at RSHT. I and others were sent to the classrooms when there was no teacher, but we were not qualified to teach the students what they were supposed to learn and all we could really do was “babysit” the classes.

7. In the Surgical Technology program, the lack of appropriate externship sites meant that students could not participate in 150 surgical procedures as required to sit for the certification examination in the field. Students were commonly sent to a hospital’s “central sterile” department, which did not give them any qualifying procedures, though it at least let them gain some familiarity with the surgical instruments which they were supposed to get through their classes but generally did not. When students did not want to go to central sterile, or we otherwise could not find an appropriate externship, students had to go on “academic interruption” – a leave of absence, in effect – in the hopes that an externship would eventually become available. RSHT eventually even lost the ability to place students in central sterile.

8. Another problem with the externship program was that RSHT’s admissions officers often misrepresented the program to prospective students. Students frequently told me that they were told they could do their externships at night, but this was not true. The students did not find this out until they were far into their time at RSHT and had already spent a lot of money on the school. This was a very big problem for many students because so many worked full-time during the day.

9. RSHT had major problems beyond the externship program. Admissions officers tried to get students to enroll regardless of their ability to succeed at and benefit from the school.

The school targeted people for enrollment who lacked the experience and the “know-how” to figure out whether the school was right for them. The school took advantage of these people.

10. The Community Home Health program was supposed to be a certificate program, but RSHT had to send its students to another school just so they could get a relatively low-level certification. RSHT stopped offering the program not long after it started.

11. Prospective Pharmacy Technician students were told that prior drug convictions would not pose a problem in becoming licensed by Virginia after graduating or in being able to do an externship, when in fact prior drug convictions are a significant problem for both.

12. Student files were supposed to include background checks and other documents that were often missing. I knew this because it was part of my job to make sure the right documentation was in the file before students began their externships.

13. We were not supposed to send students to do an externship if the background check was not clean. On one occasion, when several background checks were not clean, Melanie Chewning, a senior administrator, told me to check the boxes saying that they were clean and to send the students out on the externships. I refused, but Ms. Chewning did it herself.

14. The school had to generate reports about the percentage of graduates who were working in their field of study for regulatory purposes. Some of these numbers were altered to make it look like the school’s graduates were doing better than they actually were. In Surgical Technology and in Medical Billing and Coding, for example, it was unusual for a graduate to get a job in the field.

15. Senior school administrators were aware of RSHT’s many problems but made little if any effort to fix them. To the contrary, they often exacerbated the problems. For example, I went to Dr. Calvin Brown about a student who was about to start her externship at a

hospital after the student's instructor told me that she was not prepared for work in a real medical facility. Dr. Brown said to send the student anyway. My contact at the hospital called me after the student began the externship and said that it was not working out. I persuaded the hospital to give the student another chance, but the hospital decided not to take any more students from RSHT.

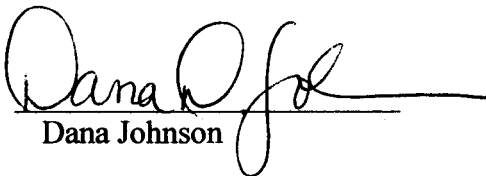
16. On another occasion, a dentist called Dr. Brown with a complaint about an extern from RSHT. Dr. Brown told me that he was not going to call the dentist back.

17. Ms. Chewning was another administrator with a similar attitude and lack of concern for the students' education. Once I told Ms. Chewning that the school should not start new students in Surgical Technology every module because we had too many students to place in appropriate externships. Ms. Chewning rejected my suggestion and said that the program was RSHT's number one money-maker.

18. People who served on the Advisory Board (which was supposed to address the school's curriculum, facilities, and textbooks) told me that the school's administrators had ignored suggestions they made at previous Advisory Board meetings, and that they were not going to come to any more meetings because it was a waste of time.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: June 27, 2012.

BY: 
Dana Johnson

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

**RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,**

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF KERRY POE

I, Kerry Poe, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from March 2009 until October 2010. The school is also known as “Richmond School of Health and Technology.”
2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program in April 2011.
3. I left RSHT with about \$18,000 in federal student loans that I cannot afford. I also had to pay \$45 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience. They told me that when I passed the certification exam, my certification would be active for four years. After enrolling, I later learned that the certification was only good for one year. I would have to retake the exam every year and pay for the exam again each year.

8. The program was also supposed to include all of the necessary surgical technology supplies. They assured me that I would not have to buy my own supplies or uniform.

9. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They guaranteed me lifetime career counseling from RSHT's career services office. They said RSHT would give me extensive assistance in finding a job.

10. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. When I met with RSHT employees before I decided to attend, I had four young children and was very concerned about being able to stay home with them during the day since I couldn't afford daycare. RSHT staff assured me that this would not be a problem and told me that the classes and externships were offered in the evenings.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I paid \$15 to take an online practice exam and I bought my own study guide. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

15. Another big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. The teacher turnover rate was also very high. For example, I had four different teachers in my core surgical technology class during my time at RSHT. One teacher rarely showed up, so we would just sit in the classroom and read our textbooks. Another teacher, Ms. Ebeling, spent all of her time on Facebook. A few of my classmates and I complained about her multiple times to the Dean of Nursing and Surgical Technology, but the Dean told us that if we continued to make a fuss, we would be kicked out of school.

16. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, I started taking my surgical technology classes before I had completed my general education classes. There were also students in my class when I first began my core surgical technology course that had already been in the program for over a year. This created a very difficult learning environment.

17. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books and sometimes we didn't receive our textbooks for a class until after the class had already started.

18. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. For example, I had to go out and buy my own uniform, and we often used dirty gowns when learning procedures that were supposed to be sterile. They made us reuse surgical gowns and brushes, even though they were designed to only be used once for sterilization reasons. Reusing these supplies means that we didn't learn proper sterilization techniques. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

19. RSHT also failed to give me an appropriate externship. I did my externship at Southside Regional Medical Center. RSHT's promise that I could complete the externship during the nighttime did not turn out to be true. I ended up having to complete my externship during the day. Having to work an externship during the day unexpectedly was an extreme hardship for me because I am a single mother and did not have day-time child care arranged. I ended up having to pay for a daycare service that I couldn't really afford so that I could complete my externship.

20. Getting a proper externship was also a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Through RSHT, I did not get the amount of time on the “floor” that I needed for my certification. There was often not enough surgical work for me, and the other RSHT students, at the externship that RSHT arranged. When I could not assist with surgical procedures, RSHT would send me to “central sterile,” where I only sterilized and packed instruments. Because RSHT did not arrange a proper externship for me, I initially did not get my 150 procedures and could not be certified. In order to get my certification, I had to independently arrange to go back to my externship site. If I had not done this on my own, I would not have gotten certified.

21. Another problem with my externship was that I didn’t have most of the skills that the staff expected to me know. This made me incredibly nervous in the operating room. I didn’t have these skills because the skills were not taught to us at RSHT. For example, we were not taught proper sterilization techniques.

22. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

23. I know very few people from RSHT who have found jobs in their field of study.

24. RSHT’s career services office has given me very little help in finding a job. All the career services office has done is provide me with a few job opportunities that I could have just as easily found on my own on the internet. When I asked them for further help, they did not return my phone calls.

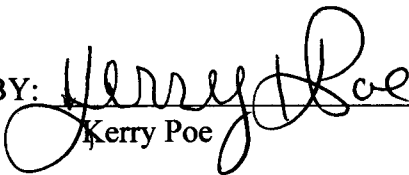
25. Instead of working as a surgical technician, I am unemployed.

26. My loans are currently in voluntary forbearance. I do not know how I am ever going to pay them back.

27. I am white, and I am a single mother. I was on food stamps and Medicaid when I first enrolled at RSHT. The majority of my classmates at RSHT were African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income people like myself as well as African-American people.

28. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: June 27 2012

BY: 
Kerry Poe

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF MICHELLE L. ROLLINS

I, Michelle L. Rollins, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee at the Richmond campus of RSHT, a school that is also known as "Richmond School of Health and Technology."

2. I hold degrees from Richard Bland College and Virginia Commonwealth University. I am working toward a master's degree in education and literacy and have received graduate-level credits at the University of La Verne in California, the University of Virginia, and the University of Phoenix. Before I came to RSHT, I was a teacher at the Chesterfield Technical Center—an alternative school for students with criminal records. I now work at Chesterfield teaching GED classes. I found the RSHT position on Craigslist.

3. I was RSHT's Academic Director of Allied Health at the Richmond campus. Allied Health covers all of RSHT's academic programs, except nursing.

4. I began working at RSHT in November 2010. I resigned voluntarily in February 2011. I left RSHT because I believed that the school was only interested in making as much money as possible and did not care at all about the education that it was providing to its students. I was frustrated by the resistance that I encountered from senior administrators when I would try to work to improve the quality of RSHT's academic programs. I also did not agree with the dishonest practices that I routinely observed.

5. At RSHT, I worked under Melanie Chewning, who was the Director of the Richmond campus. Melanie Chewning was the highest ranking employee at the Richmond campus; however, she did not have the educational background necessary for her position. She only had a GED. She was extremely disorganized. Ms. Chewning's cousin, Jill Carpenter, was hired to serve as my assistant, but she did not do anything to assist me in my position. Because of her position, Ms. Chewning had access to personal and sensitive information that pertained to students and staff. Ms. Chewning and Ms. Carpenter were extremely close and Ms. Chewning would share this information with Ms. Carpenter even though Ms. Carpenter should not have had access to it.

6. From the beginning, it was clear to me that RSHT was only concerned with enrolling as many students as possible in order to make money. Whenever I tried to advocate for the students, I was told that my position at RSHT was a corporate job and that I did not understand what needed to be done because I had a public education background. If I made any decision that negatively affected RSHT's numbers, Ms. Chewning and her staff would change my decision. I was often left out because I was vocal about RSHT's practices. When I would

complain about being excluded from various meetings and discussions, Ms. Chewning would tell me that we work individually and were not a team.

7. One method that RSHT often used to keep its enrollment numbers high was to change the grades of students who were failing into passing grades so that the students could remain enrolled. As Academic Director, I was responsible for monitoring students' academic progress, which included discharging students who were failing out of their programs. Teachers were responsible for sending me the grades that they assigned to students, and I would compile the grades in a spreadsheet. I watched Ms. Chewning cross out the F and D grades on the spreadsheet and replace them with passing grades. She would then direct me to enter the altered grades. Ms. Chewning would consistently override the decisions that I made by telling students that they could continue taking classes at RSHT, even if they were failing. Every time I tried to discharge a failing student from RSHT, Ms. Chewning would sign the paperwork that would allow the student to return. Ms. Chewning told me that because RSHT was not doing well and the budget was tight, it was very important to keep RSHT's numbers up.

8. RSHT convinced students to enroll by making false promises to them. Admissions officers would often meet with prospective students for one hour and would make a sales pitch to them. There was a PowerPoint presentation that admissions officers had to show these students that included promises about what RSHT would provide them if they enrolled at the school. For example, RSHT promised prospective students that it had strong relationships with nearby facilities where the students could have externships, but that was not true. The admissions officers were very good at convincing students to enroll at RSHT because they had been beaten over the head with the information that they had to give to prospective applicants.

Admissions officers had enrollment quotas that they had to meet. I knew of one admissions officer at the Richmond campus who was fired for not making his numbers.

9. RSHT would enroll students regardless of whether RSHT had the resources to accommodate them. For example, RSHT would enroll students in its Community Home Health Program, even though school administrators were well aware that a certification in community home health did not exist. After enrolling these students, RSHT would send them to another program, where they paid \$800 to receive some other credential—which was a fraction of the cost of what they paid to attend RSHT. While I was at RSHT, there were plans to cut the Community Home Health program because of all of the problems with it. I remember being contacted by a student who wanted to come back to the program. I was told to let her enroll in the program, even though the program was supposed to be cut and RSHT administrators knew that the program was defective.

10. RSHT also did not care about its externship program. Although RSHT promised students that they would be placed in externships, in most cases, externships were not available. I remember administrators telling students that they had been placed at specific externship sites and would begin working at these sites after Christmas, but when the students returned from the holiday break, they were told that there actually were no externships. I would try to help the externship program by calling local businesses to see whether they would be willing to accept RSHT students as externs, but Ms. Chewning would always shut down my efforts. During my time as Academic Director, there were at least 50 students who complained to me about not having the externship that they were promised.

11. RSHT had a horrible reputation among area hospitals and health care providers. None of the area hospitals wanted RSHT's surgical technician students as externs because the school was so bad.

12. The availability of textbooks was also a major problem at RSHT. There were never enough textbooks for the number of students enrolled. Some teachers had to use textbooks that were not in the syllabus for their course because the correct textbooks were not available. In many cases, students would receive their textbooks three to four weeks after classes started, which I found to be unacceptable.

13. RSHT also did not provide students with the basic supplies necessary to learn the clinical skills that RSHT was supposed to be teaching them. For example, each student in the Massage Therapy program was supposed to have his or her own set of supplies to use, but often there were no supplies at all. On many occasions, RSHT did not even provide these students with gloves. Students were also supposed to have certain types of blankets to use in their training, but there was a shortage at RSHT. Students would often have to share these blankets and, in many cases, students had to reuse these blankets instead of receiving fresh, sterile ones. One of the instructors, Mindy Garrett, had to take these blankets home to make sure that they were at least washed from time to time. Other instructors would have to bring basic materials from their homes and work places, such as pens and latex gloves, because RSHT did not provide them with anything to use in class. Students would often complain to me about the lack of supplies and I would do my best to fix the problem. I would give my order for supplies to Ms. Chewning; however, she would always make excuses about why the students did not have what they needed. I do not believe that RSHT ever ordered the supplies that I requested.

14. The supplies that RSHT had at the school were often out-of-date. For example, the mannequins that the surgical technician students used in the laboratory were supposed to be "modern day" mannequins, but they were actually from the 1980s. There was only one computer lab available for the medical assistant students. The computer textbooks that RSHT gave to the students were from the 1990s. I donated RSHT a television so that instructors would be able to show the videos that were part of the curriculum.

15. RSHT knew that it was not providing students with a quality education, but RSHT did not care. RSHT did not provide students with the support that the students needed to do well in their courses. RSHT knew that students were not passing their certification exams or getting jobs in their fields of study, but did not care. I even encouraged some of the students in the Massage Therapy program to contact the Department of Education to complain about RSHT because I was so outraged by what was happening.

16. RSHT administrators also blocked my efforts to try to rid the school of teachers who were not qualified to teach at RSHT. I remember trying to convince the administrators to fire Michelle Dillard, who taught in the Medical Assistant program. Ms. Dillard had an associate's degree, but it was not in the medical assistant field and her certifications were not up-to-date. I received numerous complaints from students about her, and almost all of her students were failing out of the program. RSHT, however, kept her on staff. She recruited a lot of students to attend RSHT, and I believe that RSHT did not fire her because she helped to enroll a lot of students in the program. I was told that Ms. Dillard had a neighbor that worked for SCHEV, an organization that certifies RSHT. I also believe that RSHT did not want to fire her because it was worried about her relationship with this neighbor.

17. I had a file of reprimands against Ms. Dillard in my office. One day I noticed that the entire file of reprimands was missing. I think that an RSHT employee stole this file from my office so that Ms. Dillard would not be terminated.

18. RSHT also used questionable tactics in assisting students with the student loan application process. Financial aid officers rushed students through the student loan application process and did not explain to students their obligations under the loans. I remember speaking with a student enrolled in the Massage Therapy program who was very upset because she had received some loan paperwork in the mail. The student had no idea what the paperwork was because the student had been told that she was receiving a scholarship to attend RSHT. The student had a long list of disabilities, including mental disabilities. The student received services from the Department of Rehabilitative Services (DRS), which is right next door to RSHT. In talking to her, I found out that Phillip Knight, who is the son of RSHT's founder, filled out the student's loan paperwork for her. After meeting with this student, I asked Mr. Knight to show me the procedures for reviewing loan paperwork with students. He showed me a stack of about 50 papers that he went over with the students. As he was demonstrating the process to me, he rushed through the paperwork without explaining what was on each page. He pointed to where I (posing as the student) was supposed to sign on each document without providing me with an opportunity to read over the paperwork that was in front of me. I believe that RSHT's financial aid officers purposefully rushed through the loan process so that students would not know how much money they were taking out in student loans.

19. Financial aid officers would also engage in tactics designed to distract students as they were applying for their student loans. For example, financial aid officers would bring their

children to work with them, which was against RSHT's policies. I believe that they brought children into the office in order to distract students as they were signing loan documents.

20. RSHT told prospective students that most students received scholarships to attend RSHT, but that was not true. I did not know many students who received scholarships from RSHT.

21. RSHT was also very aggressive about collecting monthly tuition payments from students. I was often instructed to pull students out of their classes to inform them that they had not made their monthly payments. Administrators would tell students that they would be removed from the school by security guards if they did not make their monthly tuition payments. Some teachers would even cover these monthly payments for the students so that students could remain in their classes because they knew that RSHT administrators would pull these students out of their classes, which was against their educational interests. Because RSHT rushed students through the financial aid process, students did not know that they would be saddled with these monthly payments.

22. I believe that RSHT specifically targeted and recruited African-American and low-income people for enrollment. RSHT took advantage of people who were struggling to make ends meet and sold them a lie by convincing them that attending RSHT would help them to improve their financial situation. RSHT administrators preyed upon people who they believed to be unsophisticated to try to get them to enroll at RSHT and to take out student loans to finance their education. RSHT wanted to attract students who they thought would not ask too many questions. I was always dealing with students who could barely pay their bills and who were not financially savvy. It should have been obvious to RSHT that many of the students they were

recruiting would not be able to get jobs and would not be able to repay the loans they were being put into.

23. RSHT targeted these people knowing that enrollment at RSHT would not help them get jobs, and it pressured them into loans that RSHT knew they could not afford and would not be able to repay.

24. RSHT would recruit students from the bus line, the inner-city, and poor areas like Southside Richmond and outer Henrico. I have seen an advertisement for RSHT come on at the same time as the Maury Povich show.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: August 7, 2012.

BY: 
Michelle L. Rollins

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, et al.,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

Civil Action No. 3:12CV373

DECLARATION OF MELANIE R. HOLMES

I, Melanie R. Holmes, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee at the Richmond and Chester campuses of RSHT, a school that is also known as "Richmond School of Health and Technology."
2. I learned that RSHT was hiring from an advertisement in the newspaper. I sent in a resume and had a couple of interviews with RSHT administrators Melanie Chewning and Calvin Brown. I was offered a position as an admissions officer.
3. I worked as an admissions officer at RSHT from May 2011 to August 2012. I started at the Richmond campus and was later transferred to the Chester campus in November 2011. I was transferred to the Chester campus because RSHT was planning to close its



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Richmond campus. At RSHT, I worked under Mark Kemper, the regional director of admissions, as well as Debbie Harris, the campus director for Chester.

4. I viewed my job as an RSHT admissions officer as a sales job. I sold prospective students a dream that the education at RSHT would improve their situations. Admissions officers received specific training on what to tell prospective applicants who called RSHT about enrollment. If a prospective student contacted me, I would invite the student into the office for a one-on-one "career planning session." I had a speech that I was trained to give to every applicant. During these sessions, I would tell the student all of the benefits of attending RSHT. I told prospective students that RSHT would provide them with all of the tools they needed to get a job. I told students that RSHT had small classroom sizes and that they would get a lot of individual attention. RSHT created a PowerPoint presentation that admissions officers showed to prospective students. I do not know whether the information that I gave to prospective students about RSHT was true. I was only giving prospective students the information that I had been trained to give them.

5. I also told students that RSHT would provide them with an externship if one was necessary for their program. For the medical assistant program, I was given a list of about 20-30 externship sites to show to prospective students. I told these students that RSHT had relationships with all of the medical facilities on the list and that RSHT regularly placed students at these sites. I do not know whether the information on the list that I showed prospective students was accurate.

6. I was also specifically trained on what information I should not give to applicants. For example, I was told not to talk to students about the cost of the education over the phone or until I had the opportunity to go through my presentation with prospective students.

7. I was under a lot of pressure to enroll as many students as possible. Although I was one of RSHT's top enrollers, I was often threatened and berated by Debbie Harris because I could never seem to enroll enough people. I was told to track prospective students down by doing Google searches and calling 4-1-1. I was directed to call prospective applicants over and over, even if an applicant told me that they were no longer interested in attending RSHT.

8. RSHT did not care about the quality of the students that it was enrolling. RSHT's admissions standards were very low. In fact, RSHT really did not have any admissions standards. If a person was breathing, they could enroll at RSHT. I was instructed to enroll students that I knew would not be able to complete the program. I remember meeting a student who could not read. I went to Debbie Harris because I had some concerns about enrolling this student at RSHT. Debbie Harris told me to enroll the student anyway. I felt bad about enrolling the student because I knew that the student would be stuck with loans for a program that would be of no benefit to her.

9. I was told to do whatever I had to do to get a student to enroll at RSHT. RSHT did not always offer all of the programs that it listed on its website. I was trained that if a prospective student contacted me about enrolling in a program that RSHT was not currently offering, I could not tell them that the program was not available over the telephone. Debbie Harris told me that if I gave too much information over the telephone, the prospective student would never come into the office.

10. I believe that RSHT wanted to enroll as many students as possible and to fill seats to make as much money as it could. Everything was always about money at RSHT.

11. Students would often come to me to complain about textbooks and supplies. Surgical Technology students would tell me that there were no supplies in their classrooms.

When I enrolled students, I was told to tell them that they would receive their textbooks on the first day of class. Students would often come to me to tell me that they did not have any textbooks. When I tried to follow-up with RSHT administrators about these issues, I was told not to communicate with students about anything that was going on inside of their classrooms.

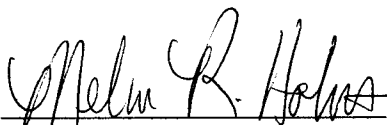
12. RSHT targeted low-income students for enrollment. Many of the students that we tried to enroll used public transportation and we were told to tell them that the Richmond campus was on the bus line.

13. Most of the prospective students that I had contact with were African-American. The majority of the students that I enrolled were African-American.

14. I know that RSHT advertises on BET.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: August 23, 2012.

BY: 
Melanie R. Holmes

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MARY MORGAN, *et al.*,

on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH
AND TECHNOLOGY, INC.,

Defendant.

No. 3:12-cv-00373-JAG

DECLARATION OF AMY M. WRIGHT

I, Amy M. Wright, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee at the Chester campus of RSHT, a school that is also known as "Richmond School of Health and Technology."
2. I was an admissions officer at RSHT from approximately January 2009 through September 2010. I was recruited to work at RSHT by Mark Kemper, the director of admissions.
3. My job as an admissions officer was to get everyone I could to enroll so that RSHT could make money from them. This included people who clearly could not benefit from the school and would never be able to pass a certification or licensing examination. We even enrolled people who could not read. These students were set up for failure from the start.

4. Part of my job was to persuade students to enroll in different programs than they wanted to. If students wanted to enroll in programs that were not available, I was told to recreate their dreams and convince them to enroll in programs that RSHT needed to fill. This was solely so the school could meet its target numbers for each program and was contrary to the students' interests.

5. RSHT gave me a script to use in persuading prospective students to enroll. I was told to withhold information that was true but that prospective students would view negatively. For example, because of how the school was accredited, the credits it granted would not transfer to many other schools. I was told that if I was asked about the transferability of credits, I should say that I was not sure. This is what I did, but it was not true.

6. We made other false statements to prospective students, such as telling them that there were many jobs available that paid well in the fields that RSHT's programs covered. We knew when we said this that there were very few jobs available in the fields, and RSHT graduates did not do well in getting those jobs. Mark Kemper made very specific statements at job fairs that were not true about the number of RSHT graduates who get jobs in their field of study.

7. RSHT specifically targeted African Americans for enrollment. RSHT advertised on BET and on radio stations with high percentages of African American listeners. In meetings, I would ask administrators why RSHT was not trying to reach a wider audience and advertise on different radio stations. I was told this was not within RSHT's budget, but I knew this was not true. Senior employees including Carolyn Lake, Maxine Stine, Debbie Harris, Sandra Kerrick, and Mark Kemper spoke openly about this. African Americans were targeted because RSHT thought it would be easier to take advantage of them and talk them into enrolling. RSHT wanted

to reach less sophisticated people it could take advantage of, and it believed that targeting African Americans allowed it to do so.

8. RHST also targeted low-income people for enrollment for similar reasons. The school's attitude was, essentially, the more indigent the better.

9. One of the ways we recruited was by calling people from lists of leads. I do not know how the lists of leads were developed.

10. The education that RSHT provided was awful. The school was a sham, and we knew it when talking prospective students into enrolling. The training students received was terrible, which was potentially very dangerous, especially in fields such as surgical technology and pharmacy technician. I spoke with local hospital staff who told me that RSHT students they encountered were very poorly prepared to work in their fields. Hospitals turned RSHT students seeking employment away because of the school's poor reputation.

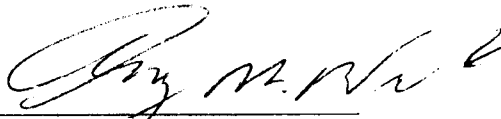
11. We did not tell prospective students about the many fundamental problems with RSHT, even though we knew about them. To the contrary, we told prospective students that RSHT was a great place that would lead to a good career and make their dreams come true.

12. RSHT's dishonesty also included falsifying documents such as graduate employment records and student grades. The school lied about whatever it needed to so that it could stay open.

13. RSHT's practices were so bad that sometimes I cried about it. By the end of my time at RSHT I just could not take it anymore, and I voluntarily left for another job.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: ^{August 27 AP}~~August 23~~, 2012.

BY: 
Amy M. Wright